
**FRESNO LOCAL AGENCY FORMATION COMMISSION (LAFCO)
EXECUTIVE OFFICER'S REPORT**

AGENDA ITEM No. 11

DATE: **October 9, 2013**

TO: **Fresno Local Agency Formation Commission**

FROM: **David E. Fey, AICP, Executive Officer**

SUBJECT: **Consider Adoption – Municipal Service Review and Sphere of Influence Update Prepared for the Coalinga-Huron Recreation and Park District.**

Recommendations:

- A) Acting as Lead Agency pursuant to California Environmental Quality Act (CEQA) Guidelines, find that prior to adopting the written determinations, the Municipal Service Review and Sphere of Influence determination under consideration are Categorically Exempt from the provisions of the California Environmental Quality Act (CEQA) under Section 15306, "Information Collection" and Section 15061(b)(3), "General Rule Exemption."
- B) Find that the Municipal Service Review and Sphere of Influence Update prepared for the District are complete and satisfactory.
- C) Find that the written determinations within the Municipal Service Review and Sphere of Influence Update satisfy State Law.
- D) Pursuant to Government Code Sections 56425 and 56430 make the required determinations for the Municipal Service Review and District Sphere of Influence, adopt the Municipal Service Review prepared for the District, and update the Sphere of Influence for said District by reaffirming the current boundaries.

Description:

The Coalinga-Huron Recreation and Park District encompasses 550,006 acres in southwestern Fresno including the Cities of Coalinga and Huron. The District provides recreation and park services to the residents in the District.

Summary / Background

The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 requires LAFCo to review and update, as necessary, special district Spheres of Influence (SOIs) every five years. Prior to, or in conjunction with an agency's SOI update, LAFCo is required to conduct a *Municipal Service Review (MSR)* for each agency.

Municipal Service Reviews provide a comprehensive review of the services provided by a city or district and present recommendations with regard to the condition and adequacy of these services and whether or not modifications to a city or district's SOI are necessary. MSR's can be used as informational tools by LAFCo and local agencies in evaluating the efficiencies of current district operations and may suggest changes in order to better serve the public.

Sphere of Influence updates may involve an affirmation of the existing SOI boundaries or recommend modifications to the SOI boundaries. LAFCo is not required to initiate changes to an SOI based on findings and recommendations of the service review, although it does have the power to do so.

State law requires that the Commission adopt written MSR determinations for each of the following seven criteria:

1. Growth and population projections for the affected area.
2. Location and characteristics of any disadvantaged unincorporated communities,
3. Present and planned capacity of public facilities and adequacy of public services, including infrastructure needs or deficiencies.
4. Financial ability of agencies to provide services.
5. Status of, and opportunities for, shared facilities.
6. Accountability for community service needs, including governmental structure and operational efficiencies.
7. Any other matter related to effective or efficient service delivery, as required by commission policy.

As part of the SOI update, the Commission is required to consider the following four criteria and make appropriate determinations in relationship to each:

1. The present and planned land uses in the area, including agricultural and open-space lands.
2. The present and probable need for public facilities and services in the area.
3. The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide.
4. The existence of any social or economic communities of interest in the area if the Commission determines that they are relevant to the agency.

Environmental Determination

The California Environmental Quality Act ("CEQA") requires that the Commission undertake and review an environmental analysis before granting approval of a project, as defined by CEQA. This MSR is categorically exempt from the preparation of environmental documentation under a classification related to information gathering (Class 6 - Regulation section 15306), which states: "Class 6 consists of basic data collection, research, experimental management, and resource evaluation activities which do not result in a serious or major disturbance to an environmental resource. These may be strictly for information gathering purposes, or as part of a study leading to an action which a public agency has not yet approved, adopted, or funded." Indeed, MSR's collect data for the purpose of evaluating municipal services provided by the agencies. There are no land use changes or environmental impacts created by such studies.

Furthermore, this MSR qualifies for a general exemption from environmental review based upon CEQA Regulation section 15061(b)(3), which states: "The activity is covered by the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA." Additionally, the SOI update qualifies for the same general exemption from environmental review based upon CEQA Regulation section 15061(b)(3).

There is no possibility that this MSR or SOI update may have a significant effect on the environment because there is no land use changes associated with the documents. If the Commission approves and adopts the MSR and SOI update and determines that the project is exempt from CEQA, staff will prepare a notice of exemption as required by CEQA Regulation section 15062.



***COALINGA-HURON RECREATION
AND PARK DISTRICT
MUNICIPAL SERVICE REVIEW
PUBLIC REVIEW DRAFT***

July 30, 2013

Prepared for the
Local Agency Formation Commission of Fresno County
by
Policy Consulting Associates, LLC

TABLE OF CONTENTS

1. AGENCY OVERVIEW	2
FORMATION	2
BOUNDARY	2
SPHERE OF INFLUENCE	3
ACCOUNTABILITY AND GOVERNANCE.....	5
MANAGEMENT AND STAFFING	6
GROWTH AND POPULATION PROJECTIONS.....	7
FINANCING	10
2. MUNICIPAL SERVICES.....	14
RECREATION AND PARK SERVICES	14
3. GOVERNANCE STRUCTURE ALTERNATIVES.....	20
4. MSR DETERMINATIONS.....	23
5. SPHERE OF INFLUENCE UPDATE.....	26

1. AGENCY OVERVIEW

Coalinga-Huron Recreation and Park District (CHRPD) offers special events, activities, sports and recreation programs in four parks, two community centers, one fitness center, one senior center, two pools, and Camp Yeager. The District also provides the services of a Landscape and Lighting Maintenance District. The most recent municipal service review (MSR) for CHRPD was adopted in September 2007.

FORMATION

CHRPD was formed in 1971 as an independent special district to provide services formerly provided by the Coalinga-Huron Unified School District in the cities of Coalinga and Huron.

The principal act that governs the District is the Recreation and Park District Law.¹ The principal act empowers Recreation and Park Districts to 1) organize, promote, conduct, and advertise programs of community recreation, including, but not limited to, parks and open space, parking, transportation, and other related services that improve the community's quality of life, 2) establish systems of recreation and recreation facilities, including, but not limited to, parks and open space, and 3) acquire, construct, improve, maintain, and operate recreation facilities, including, but not limited to, parks and open space, both inside and beyond the district's boundaries.² Districts must apply and obtain LAFCo approval to exercise latent powers, that is, those services authorized by the principal act but not provided by the district by the end of 2000.³

BOUNDARY

CHRPD is located in the southwest portion of Fresno County, adjacent to Kings, Monterey and San Benito counties, and encompasses approximately 550,006 acres (859 square miles). Included within the District's boundaries are the cities of Coalinga and Huron and surrounding unincorporated areas. The District's boundaries are identical to those of the Coalinga Unified School District and Coalinga-Huron Library District. The only other recreation and park district in Fresno County is Calwa Recreation and Park District located in the City of Fresno. Since the District's formation, there have been no changes to its boundaries.

¹ Public Resources Code, Div. 5, Ch. 4, comprising §§ 5780-5791.

² California Public Resources Code §5786.

³ Government Code §56824.10.

Extra-territorial Services

CHRPD provides limited services outside of its district boundaries. The District owns, maintains and runs its summer program in Camp Yeager located in Cambria, which is about 100 miles outside of the CHRPD boundaries. The District does not provide any other extra-territorial services or facilities.

Unserved Areas

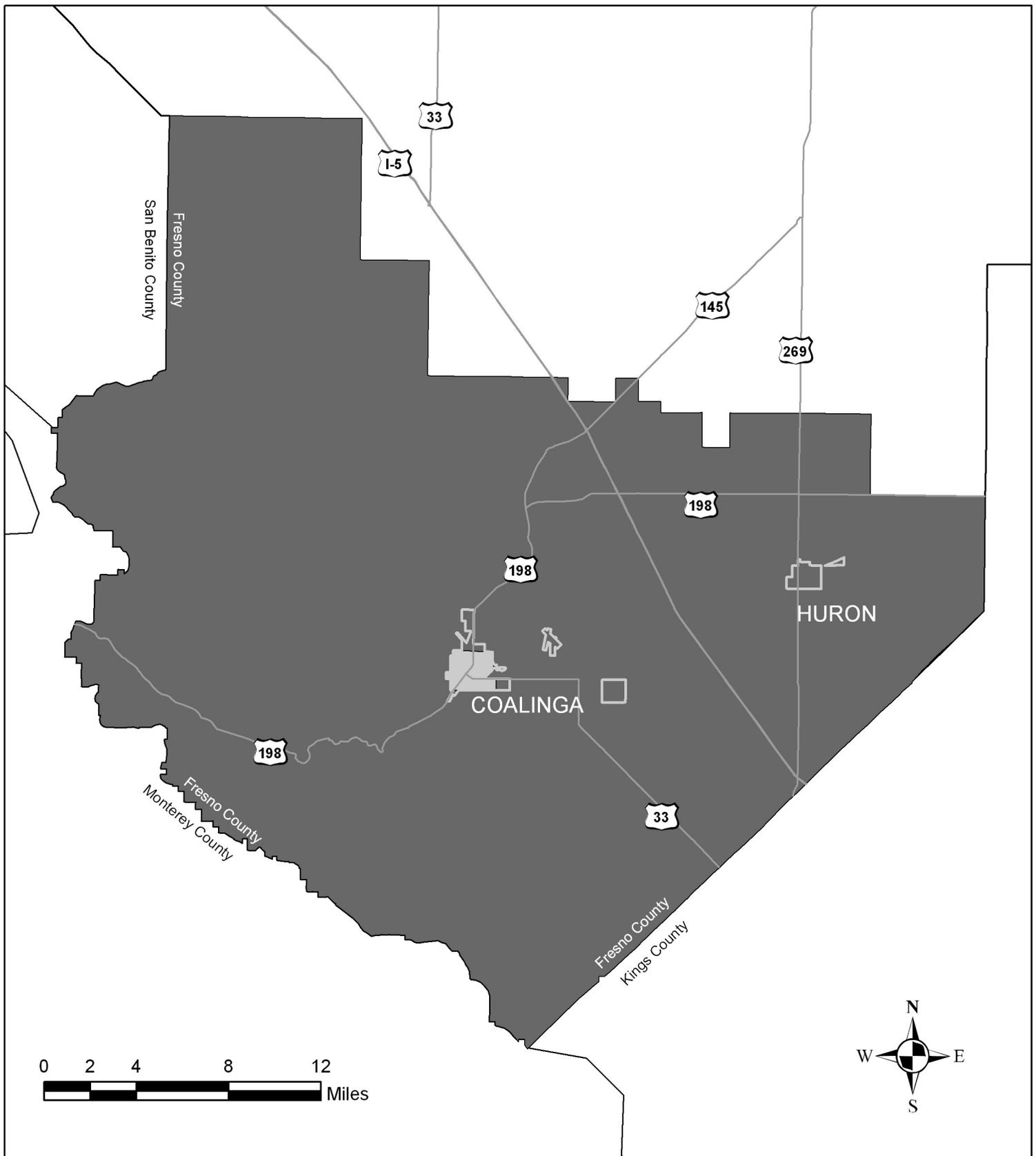
There are no areas within CHRPD's boundaries that lack recreation and park services. While some areas are further away from district facilities, all district residents are allowed to use CHRPD park and recreation facilities.

Overlapping Providers

There are three agencies that overlap CHRPD's boundaries and provide recreation and park services—Fresno County, City of Coalinga and City of Huron. The City of Coalinga owns and maintains two parks with a total of seven acres, but does not run any recreational programs. City of Huron does not provide any park services, but owns and runs a senior center that provides multiple recreational activities for its visitors. Fresno County owns and operates a variety of regional parks and landscaped areas, which include 13 parks, four fishing access areas and a boat-launch/parking facility at Shaver Lake. Within the CHRPD boundaries, the County runs Huron Fishing Access and Los Gatos Creek Park which is a regional park that provides trails for walkers, joggers, bicyclists, skaters, non-motorized scooters, bladders, and nature lovers. While services offered by these agencies are related to parks and recreation, the City of Coalinga only maintains two small parks, which add to the limited parkland acreage owned by the District and does not run any recreation programs. City of Huron contributes to the area's recreational opportunities by operating a senior recreation center. The County also provides complimentary, rather than the same, park services consisting of larger-scale regional recreational opportunities.

SPHERE OF INFLUENCE

CHRPD's SOI was established on March 19, 1976 as coterminous with the District's boundaries. No changes have been made to the SOI since its creation. During the 2007 SOI update the Commission elected to reaffirm CHRPD's coterminous SOI.



Fresno Local Agency Formation Commission Coalinga-Huron Recreation and Park District

Legend

- District Area and SOI
- City Areas

District Formed: 1971
 SOI Adopted: May 19, 1976
 Map Date: August 2007

District Area: 550,006 Acres
 Sphere Area: 550,006 Acres

ACCOUNTABILITY AND GOVERNANCE

Accountability of a governing body is signified by a combination of several indicators. The indicators chosen here are limited to 1) agency efforts to engage and educate constituents through outreach activities, in addition to legally required activities such as agenda posting and public meetings, 2) a defined complaint process designed to handle all issues to resolution, and 3) transparency of the agency as indicated by cooperation with the MSR process and information disclosure.

CHRPD is governed by a five-member Board of Directors. Board members are residents of the District elected at large to four-year terms. Board members do not receive compensation. Two of the five current members were elected; all others were appointed by the County Board of Supervisors. If no one runs for a position, then the Board of Supervisors is empowered to appoint any person to the office when the election would have been held.⁴ Board member names and term expiration dates are shown in Figure 1-2.

Figure 1-2: Coalinga-Huron Recreation and Park District Governing Body

Coalinga-Huron Recreation and Park District				
<i>District Contact Information</i>				
Contact:	Mark Honberger, General Manager			
Address:	555 Monroe Street, Coalinga, CA 93210			
Telephone:	559-935-0727			
Fax:	559-935-1293			
Email:	marknrec@chrpd.org			
Website:	www.chrpd.org			
<i>Board of Directors</i>				
Member Name	Position	Term Expires	Manner of Selection	Length of Term
Scott Yeager	President	December 2016	Appointed	4 years
Dave McGlothlin	Vice-President	December 2016	Appointed	4 years
Wendy Luna	Treasurer	December 2014	Elected	4 years
Kirk Irwin	Director	December 2014	Elected	4 years
Russ Richardson	Director	December 2016	Appointed	4 years
<i>Meetings</i>				
Date:	Second Thursday of each month at 6pm.			
Location:	Keck Community Center or Keenan Community Center			
Agenda Distribution:	Posted at the Community Center, faxed to local agencies and will be posted on the website in the near future.			
Minutes Distribution:	Minutes available upon request and will be posted on the website in the near future.			

⁴ Elec. Code, § 10515(a).

The Board of Directors meets on the second Thursday of every month at six in the evening at either Keck Community Center in Coalinga or Keenan Community Center in Huron. Agendas are posted on the community center doors, and faxed to all local agencies. Meeting minutes are available upon request. There are links on the district website for both, meeting agendas and minutes; however, none have been posted yet.

CHRPD encourages voters to participate in elections and keeps its constituents informed of the district activities via its quarterly activity guide, the CHRPD Facebook page, in the local newspaper, and on the district website. The activity guide is mailed to every resident on a quarterly basis, the Facebook page is updated weekly, and articles on district activities appear in two out of every three issues of the local newspaper.

Customers can submit their complaints about district services in several ways. The website contains a “contact us” page which allows for anonymous comments. Some residents leave comments on the District’s Facebook page, which gives CHRPD a chance to respond to them. Customers also have an opportunity to call or come into the office and speak to staff directly. The general manager is responsible for handling complaints if they cannot be resolved at the supervisor level or at the front desk. Comments and complaints are generally not tracked; but emails through the website are stored. The District reported that it did not receive any formal written complaints in 2012.

CHRPD demonstrated full accountability and transparency in its disclosure of information and cooperation with Fresno LAFCo during the MSR process. CHRPD responded to questionnaires and cooperated with document requests. It is recommended that the District start tracking its comments and complaints received electronically, verbally or via other means.

MANAGEMENT AND STAFFING

While public sector management standards vary depending on the size and scope of the organization, there are minimum standards. Well-managed organizations evaluate employees annually, track employee and agency productivity, periodically review agency performance, prepare a budget before the beginning of the fiscal year, conduct periodic financial audits to safeguard the public trust, maintain relatively current financial records, conduct advanced planning for future service needs, and plan and budget for capital needs.

CHRPD employs 12 full-time and 60 part-time and seasonal staff. The general manager, who is responsible for day-to-day operations, oversees an accountant, a registration clerk, an operations manager, and two recreation supervisors. The operations manager supervises the senior utility worker and four other employees. Recreation supervisors manage the remaining personnel. All personnel are evaluated annually.

Staff workload is tracked through timesheets. To improve upon its productivity the agency is planning to develop a more detailed timesheet where employees would record every task by function. The District also keeps a maintenance log for the utility workers.

The District reported that it evaluated its performance through setting high-level goals and programs and regularly evaluating the results. In addition, CHRPD reviews and adopts best management practices employed by other agencies. The District conducted an informal survey of their rates and compared them to the ones adopted by similar agencies.

CHRPD's management practices include annually adopted budgets and annually audited financial statements. Prior to this year, the District had not been conducting formal capital improvement planning; however, CHRPD is currently starting the process of putting together a capital improvement plan (CIP). Presently, capital improvement projects are planned for on an annual basis during the budget process.

Government Code §53901 states that within 60 days after the beginning of the fiscal year each local agency must submit its budget to the county auditor. These budgets are to be filed and made available on request by the public at the county auditor's office. The County reported that the District has not submitted a budget since at least 2004. It is a recommended best management practice that the District adopt a budget prior to the start of the new fiscal year in anticipation of estimated revenues and expenditures, and submit the budget to the County as required by law.

All special districts are required to submit annual audits to the County within 12 months of the completion of the fiscal year, unless the Board of Supervisors has approved a biennial or five-year schedule.⁵ In the case of CHRPD, the District must submit audits annually. CHRPD has not submitted an audited statement to the County since 2007.

GROWTH AND POPULATION PROJECTIONS

This section discusses the factors affecting service demand, such as land uses, and historical and anticipated population growth.

Land Use

CHRPD's boundary area is approximately 859 square miles. The County is the land use authority for the unincorporated areas. Cities are the land use authorities within the respective city boundaries. CHRPD encompasses every land use designated by the cities. In the unincorporated areas, land uses are generally agricultural with grazing lands, grain and hay crops, other field crops, orchards, and berry crops.

⁵ Government Code §26909.

Existing Population

As of 2010, the population of the area in CHRPD was approximately 25,224, based on GIS analysis of Census 2010 data. Its population density—29 residents per square mile—is lower than the countywide density of 159 people per square mile.

Disadvantaged Unincorporated Communities

LAFCo is required to evaluate disadvantaged unincorporated communities as part of this service review, including the location and characteristics of any such communities. A disadvantaged unincorporated community is defined as any area with 12 or more registered voters, or as determined by commission policy, where the median household income is less than 80 percent of the statewide annual median.⁶

The California Department of Water Resources (DWR) has developed a mapping tool based on census data to assist in determining which communities meet the disadvantaged communities' median household income definition. DWR is not bound by the same law as LAFCo to define communities with a minimum threshold of 12 or more registered voters. However, the DWR data can be used for the purposes of this report as an indicator of any larger communities that may meet the income definition of disadvantaged. Based on mapping information from DWR, there are at least two disadvantaged communities within or adjacent to CHRPD; however these areas are the two incorporated cities (Coalinga and Huron) within the District and are therefore not disadvantaged unincorporated territories.⁷

Projected Growth and Development

Based on population projections prepared for the Fresno Council of Governments, the population of the County is anticipated to grow by 64 percent over the 40-year period from 2010 to 2050, with annual average growth of 1.2 percent.⁸ These projections are countywide, and are not specific to the Coalinga and Huron areas; however, if these projections are used to inform anticipated growth in the region, the population within CHRPD is anticipated to increase to 41,367 by 2050. The City of Coalinga projects higher growth rates of 3.5 percent annually through 2025 in its General Plan update; however, these projections were made prior to the housing market crash and may be overestimated.

⁶ Government Code §56033.5.

⁷ DWR maps and GIS files are derived from the US Census Bureau's American Community Survey (ACS) and are compiled for the five-year period 2006-2010.

⁸ Fresno Council of Governments, San Joaquin Valley Demographic Forecasts 2010 to 2050, March 27, 2012, p.18.

Potential development within the District is largely centered in the City of Coalinga. There are some areas that have roads and other infrastructure with between 100 and 150 finished lots, where there is the greatest potential for new residential development in the near future. In addition to these areas, the City reported that as of May 2013 there were five tentative maps that had been approved in the past that had the potential to add approximately 1,800 dwelling units to the area. However, these developments are presently on hold and are greatly dependent on demand for new housing. The City is working with the State on the Warthan Place multi-family housing project, which will add 162 multi-family units upon completion of two phases. If the City is approved for funding, the project could move forward in the next year.⁹

The District reported that land use patterns have not been affecting its service demand in the last few years, since no new developments have been constructed. However, it was also reported that there has been greater use of CHRPD services, because CHRPD widened its range of recreational opportunities and made its residents more aware of the available options.

The District reported that it was not anticipating any future growth in the short term. In Coalinga and Huron there are new streets with new names, but no sign of economic recovery and anticipated new construction. CHRPD forecasts its service demand by collaborating with the Coalinga and Huron city councils on estimating future needs and partnership opportunities. The District also projects its demand by keeping an eye on the regional job market as major employers in the area, such as Harris Ranch, Coalinga State Hospital, a regional medical center, and a state prison, retain the area's current population and may lend to population growth in the future by increasing their employee base.

The District reported that it generally had the capacity to address existing demand and possible growth, due to the increase in the property tax revenue discussed in the Financing section of this report. CHRPD identified, however, some challenges to service provision, such as gang elements and their activities primarily in Huron area. The District does not have any security of its own but maintains close contact with police departments in Coalinga and Huron. CHRPD also keeps the back parking lot of Keck Park closed at night to keep criminal activity away from the district facilities.

⁹ Communication with Sean Brewer, Assistant Director of Community Development, City of Coalinga, May 14, 2013.

FINANCING

The financial ability of agencies to provide services is affected by available financing sources and financing constraints. This section discusses the major financing constraints faced by CHRPD.

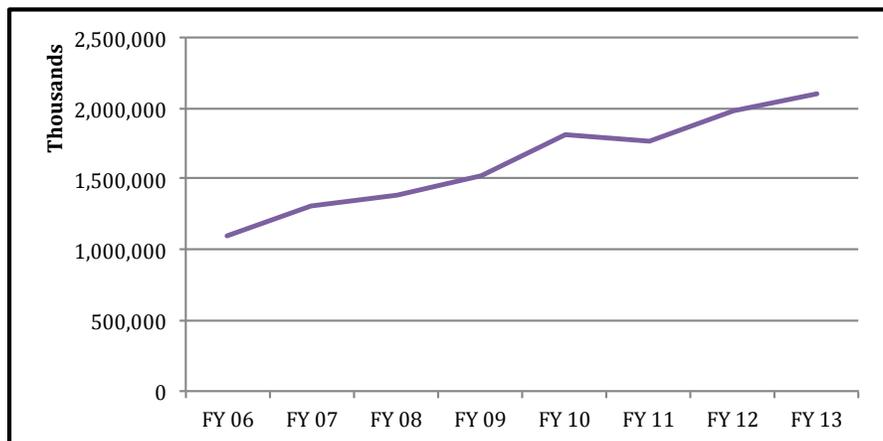
CHRPD reported that its financing was adequate to deliver services; however, the District identified a challenge associated with financing a significant capital improvement project. Neither the District nor the City have sufficient funding for the construction of the multi-million dollar sports complex. CHRPD is continuously applying for grants to finance the project.

Unlike other public agencies around the State that rely on property tax revenues, CHRPD has experienced an increase in property tax revenues, due to an increase in assessed value of property within its boundaries. Between FY 06 and FY 13, the net assessed value of properties within the District increased by 92 percent, and only experienced a slight drop in value between FYs 10 and 11, as shown in Figure 1-3. Prior to this increase in revenue, the District reportedly was struggling and barely had enough funds to continue its existence. The additional revenue has made it possible for the District to not only start providing services at an adequate level, but to expand its recreational program range.

Despite the increased revenues, the District experienced some fiscal challenges caused by the recent economic downturn. CHRPD had to reduce maintenance crews and take on new loans.

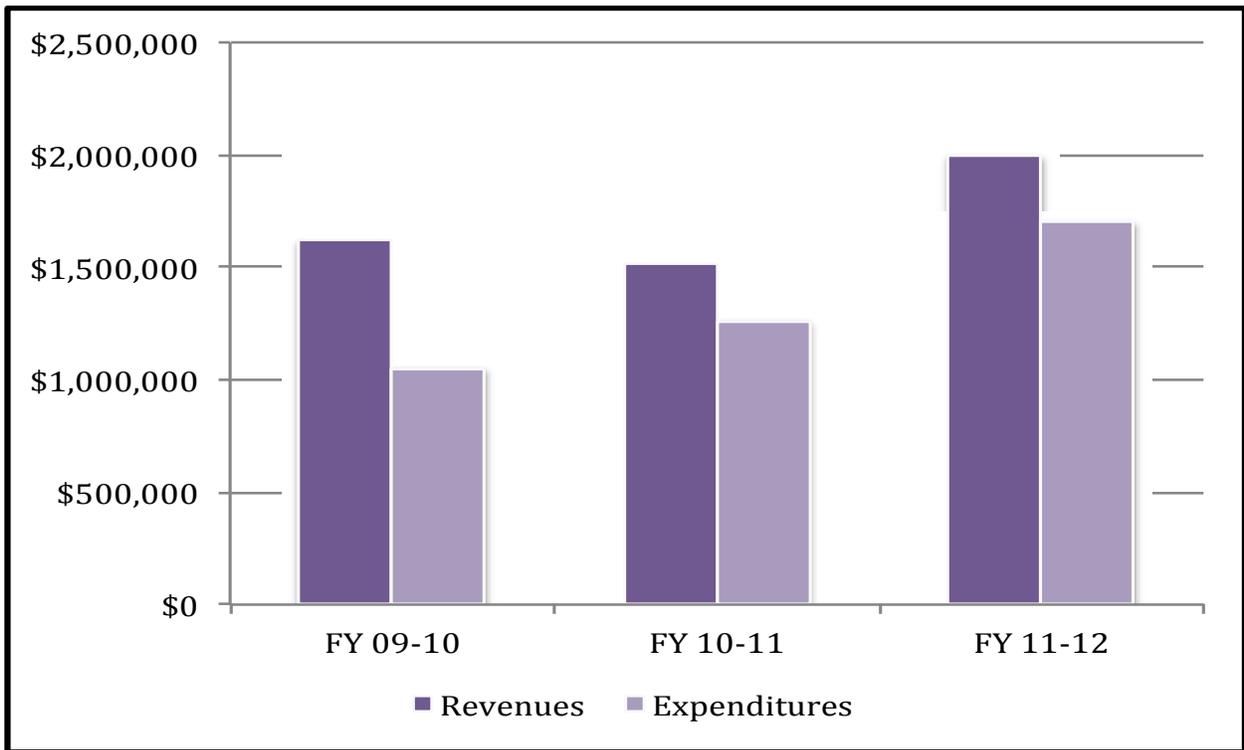
Figure 1-3: Property Tax Net Assessed Value (2006-2013)

CHRPD identified additional financing opportunities that included collaborating with community groups for recreational programs, asking parents for assistance, partnering with cities for utility discounts, and increasing interest of the community in the affairs of the District to promote donations and contributions.



Over the past three fiscal years (FYs 10 to 12), district revenues have exceeded expenditures, as shown in Figure 1-4. Both, revenue and expenditures slightly increased in FY 12.

Figure 1-4: CHRPD Revenues and Expenditures, FYs 10-12



Source: Audited Financial Statements for FY 2010 through FY 2012

Revenues

In FY 11-12, CHRPD's revenues were \$1,996,561 and consisted of property taxes and assessments (69 percent), programs, concessions and related income (12 percent), donations (11 percent), grants (five percent), investment earnings (one percent), and other (two percent). About seven percent of property taxes and assessments came from tax assessments.

Tax assessments are collected within the District's Landscape and Lighting Maintenance District. The amount per parcel differs based on location: residents in Dorothy Allen Estates II pay \$244.56, in Warthan Creek Estates \$182.88 and in Dorothy Allen Estates \$251.90.

The District charges fees for some of its programs and services. Charges for rentals at the Olsen Park and Chestnut Park depend on the number of attendees and vary from \$20 to \$80 per event for district residents and from \$30 to \$100 per event for non-residents. If an event is attended by more than 300 people, the customer is also charged for electricity. For the use of the deep pit barbeque the District charges \$20 per day from residents and \$40 per day from non-residents. Veterans Field can be used for \$10 per hour by residents and for \$20 an hour by non-residents; lights at the field are available for \$15 per two hours and \$25 per two hours by residents and non-residents, respectively. Tournament fees are based on maintenance needs. The softball field is rented out for \$10 per hour to residents and \$20 per hour to non-residents. The District's fees for the use of softball field lights are \$15 per

two hours for residents and \$25 for non-residents. Fees for the use of Keck Community Center range from \$10 to \$32 per hour or per event for residents and from \$17 to \$58 per hour or per event for non-residents depending on the room type. To use the senior center a resident would pay \$10-\$29 per hour or event and a non-resident would pay \$17-\$40 per hour or event. To rent facilities at Keenan Center it costs anywhere from \$10 to \$32 per hour or event for residents and \$17-\$58 per hour or event for non-residents. Security cleaning deposits vary depending on the facility and the residency status from \$25 per event to \$250 per event.

The Yeager facility is rentable throughout the year. The District has a rental contract with the Kings County School District. The rental rates at Camp Yeager differ from \$500 per night for residents to \$800 for non-residents, with \$250 and \$1,000 security deposit for residents and non-residents respectively to rent the entire facility.. The camp's maximum capacity is 125 people. The summer camp organized by the District at the Yeager Camp costs \$80 per session for residents and \$120 for non-residents. These fees have been reduced to make it more affordable for children to attend the camp.

The fitness center charges membership fees that vary by length and membership type (individual, family, student, college, and senior) and range from \$5 for a daily fee to \$275 for a family full-year membership. Non-residents are charged higher fees.

The park impact fees charged by CHRPD are \$1,070 per single family residence, \$936 per multi-family dwelling, \$0.18 per square foot of commercial space, and \$0.09 per square foot of industrial space.

Expenditures

CHRPD expenditures in FY 11-12 were \$1,703,383 and included mainly payroll and benefits (37 percent), contract services (six percent), repairs and maintenance (10 percent), supplies (eight percent), utilities (17 percent), capital outlays (10 percent), and debt service (four percent). The remainder of the funds were spent on advertising, donations, gas and oil, insurance, miscellaneous, office, and security.

In FY 11-12, the District's total revenues exceeded total expenditures by \$293,178.

Liabilities and Assets

CHRPD does not have a formal policy regarding maintaining financial reserves. However, two years ago, the general manager initiated a management practice to do so. At the end of FY 11-12, CHRPD had a balance of \$400,000 in its contingency reserve and \$500,000 of donated funds in a separate account. The assessment money collected for the Lighting and Landscaping Maintenance District is also kept in a separate reserve account. In addition, the District maintains a capital improvement project (CIP) reserve for the replacement of the large lawn mower. CHRPD puts away \$30,000 per year into the CIP reserve, which at the end of FY 11-12 contained a balance of \$60,000.

The District's long-term debt is represented by a municipal lease agreement entered into by CHRPD in November of 2004 with M.L. Stern & Co., LLC. The agreement grants M.L. Stern a security interest in certain real estate owned by the District, which consists principally of the fitness center (located in Coalinga) and the senior center (also located in Coalinga). The original principal of the note was \$532,100 of which \$32,100 was used for prepaid financing costs. The term of the debt is 10 years with interest varying from three percent to 5.1 percent depending on maturity. At the end of FY 11-12, the long-term debt balance amounted to \$95,766.

Financing Efficiencies

The District does not participate in any joint financing mechanisms such as joint power authorities (JPAs).

2. MUNICIPAL SERVICES

RECREATION AND PARK SERVICES

Service Overview

CHRPD is responsible for the maintenance and operations related to special events, activities, sports and recreation programs for youth and adults that take place in four parks, two community centers, one fitness center, one senior center, two pools and a Landscape and Lighting Maintenance District. CHRPD also operates Camp Yeager located in Cambria that accommodates about 150 people.

Recreational opportunities provided by the District include various fitness classes, dodgeball, family nights, boxing, painting, a flea market, volleyball league, flight league tournament, Harris Farm lunch, volleyball hour, historic walking tour, down home southern dinner, youth football league, spring softball league, and an Iris Festival trip. The senior center offers lunches and a senior nutrition program, among others.

Demand for Services

Two major factors influencing service demand for CHRPD are population growth and the range of recreational activities offered by the District. The wider the range of recreational opportunities, the greater the chance that a resident will find a preferred option, therefore potentially more people would be using services offered by a district.

It is difficult to estimate the attendance of the parks; CHRPD also does not track attendance at its community centers and programs (excluding summer camp). The District reported that it had recently ordered recreation software that would enable CHRPD to track memberships and attendance.

CHRPD reported that about 70 students participated in summer camp in each of the 2011 and 2012, which was an increase from previous years that occurred due to decrease in fees.

The District reported that it tracked the number of residents versus non-residents buying memberships at the fitness center, registering for summer camp program and leasing Camp Yeager for events. Reportedly there are very few non-residents who use the District's fitness center and participate in the summer camp program. However, for Camp Yeager the estimated number of non-resident users is about 50 percent. For all other programs the District could not estimate the number of non-resident users since currently CHRPD does not track their addresses. Reportedly, new software will solve this tracking challenge.

The District reported that in the last few years the demand for services had increased, because CHRPD widened its range of recreational opportunities and made its residents more aware of the available options.

The District also reported that it was not anticipating any future growth. However, CHRPD believes that if it added more recreational opportunities the number of district customers would once again increase.

Infrastructure and Facilities

CHRPD owns and operates four parks, two community centers, a fitness center, a senior community center, a swimming pool, and the camp. Every summer the District rents the Coalinga Swim Complex from Coalinga-Huron Unified School District. In addition, the District owns an undeveloped Youth Sports Complex that is not open to public and is currently being developed through a partnership of CHRPD with the City of Coalinga. The details about each facility are shown in Figure 1-5.

Camp Yeager is located outside of the District's boundaries in Cambria, one mile from the Pacific Coast. The 14 acre facility is located in the pines and offers a dining hall, 18 cabins, a new restroom/shower facility, a recreation hall, outdoor stage, camp fire and trail.

CHRPD also provides for public use an original nine-hole disc golf course at Keck Park. The course consists of nine holes with a total length of 2,974 feet, but a variation of holes can be played to make it an 18-hole course. The course is unstaffed and available on a first-come, first-served basis.

The District also makes available six outdoor four-sided handball courts and operates multiple ball fields, including softball, basketball, volleyball, and baseball, details about which could be found in Figure 1-5.

Infrastructure Needs or Deficiencies

The District identified minor short-term infrastructure needs, including the need for a system to cool the gym and repair or replacement of damaged lighting in the park.

Longer term needs consist of replacing the recreation hall at Camp Yeager with a new building and replacing the Veterans Field bathrooms. Within the Coalinga Sports Complex, the District has a goal of building additional ballfields.

Figure 1-5: CHRPD Recreation and Park Infrastructure

Facility	Location	Size	Owner	Maintained
Keck Park	555 Monroe Street, Coalinga, CA 93210	16 acres	CHRPD	CHRPD
Keck Community Center	555 Monroe Street, Coalinga, CA 93210	11,400 square feet	CHRPD	CHRPD
Olsen Park	400 Garfield Avenue, Coalinga, CA 93210	12.5 acres	CHRPD	CHRPD
Coalinga Fitness Center	191 E Forest Street, Coalinga, CA 93210	8,000 square feet	CHRPD	CHRPD
Senior Activity Center	220 E Forest Street, Coalinga, CA 93210	6,600 square feet	CHRPD	CHRPD
Coalinga Youth Sports Complex	Cambridge Avenue, Coalinga, CA 93210	87 acres	CHRPD	City of Coalinga
Coalinga Swim Complex	1201 Falcon Lane, Coalinga, CA 93210	1.5 acres	Rented from CHUSD every summer	CHUSD
Keenan Park	170947 Myrtle Street, Huron, CA 93234	8.5 acres	CHRPD	CHRPD
Keenan Community Center	170947 Myrtle Street, Huron, CA 93234	11,400 square feet	CHRPD	CHRPD
Chestnut Park	16501 Palmer Avenue, Huron, CA 93234	11 acres	CHRPD	CHRPD
Chestnut Swimming Pool	16501 Palmer Avenue, Huron, CA 93234	0.5 acres	CHRPD	CHRPD
Camp Yeager	525 Ashby Lane, Cambria, CA 93428	13 acres	CHRPD	CHRPD

Figure 1-5: CHRPD Recreation and Park Infrastructure Continued

Facility	Condition	Hours Open	Purpose/Amenities
Keck Park	Fair	Dawn till 10pm	Turf areas, playground, walking paths, basketball courts, handball/racquetball courts, disc golf course, parking lot, Kick Community Center
Keck Community Center	Fair	8am-5pm (M-F)	Rental hall, meeting rooms, kitchen, CHRPD main office
Olsen Park	Fair	Dawn till 10pm	Turf areas, playground, rentable picnic area with shade structure & BBQs, horseshoe pits, volleyball area, covered outdoor stage, parkign lot, CHRPD maintenance shop & yard
Goalinga Fitness Center	Fair	5:30am-9pm (M-Th), 5:30am-5pm (F), 8am-12pm (Sa), Closed (Su)	Gymnasium, free weights, cardio machines, aerobic classes, childcare for members, locker room
Senior Activity Center	Fair	9am-1:30pm (M-F)	Senior programming space, kitchen, rental meeting rooms
Coalinga Youth Sports Complex	Fair	Dawn till 10pm	Soccer fields, amphitheatre, walking path, skate park, BMX track, restrooms & snackbar, dog park, parking lots
Coalinga Swim Complex	Fair	Mornings, afternoons, family nights	water slide, wading pool, lap pool, locker room, lifeguard office, snackbar, picnic tables, maintenance and pump room
Keenan Park	Fair	Dawn till 10pm	Turf areas, playground, ballfield, basketball courts, parking lot, Keenan Community Center
Keenan Community Center	Fair	8am-9pm (M-F)	Drop-in recreation center, rental hall, meeting rooms, kitchen, fitness rooms, CHRPD Huron office
Chestnut Park	Fair	Dawn till 10pm	Turf areas, playground, ballfield, walking path, rentable picnic area with shade structure & BBQs, parking lot, Chestnut swimming pool
Chestnut Swimming Pool	Fair	Lessons mornings, rec afternoons, family nights (summers)	Recreational pool, locker room, lifeguard office, maintenance and pump room
Camp Yeager	Fair	Summer M-F or for rent	Rustic cabins, dining hall, recreation hall, camp fire, meadow, volleyball, basketball court, walking trails

Shared Facilities and Regional Collaboration

CHRPD facilities are not shared with other agencies. They are, however, rented by other agencies.

Additionally, every summer CHRPD uses the swim complex that belongs to the Coalinga-Huron School District. CHRPD also utilizes the school gymnasium for a basketball program each year. The school district has about 10 acres of turf that is potentially available to the District for recreational programming.

It was reported that the Coalinga Youth Sports Complex represents an opportunity for shared facilities with the City of Coalinga.

CHRPD collaborates with other agencies through its membership in the California Park and Recreation Society (CPRS), National Recreation and Park Association (NRPA), California Association of Recreation and Park Districts (CARPD), and California Special District Association (CSDA).

CHRPD reported that it is continuously looking for opportunities to establish agreements for shared facilities and collaboration for the mutual benefit of agencies involved.

Service Adequacy

This section reviews indicators of service adequacy, including developed parkland per 1,000 residents, operating expenditures per acre, recreation center hours per week, maintenance staff hours per acre per year, and capacity constraints.

The national park acreage standard per the National Recreation and Park Association (NRPA) is four acres per 1,000 residents. NRPA is currently leading a charge to move towards a goal of five acres per 1,000 residents. For CHRPD, the goal is four acres per 1,000 residents. To compare, the countywide parkland ratio is about seven acres per 1,000 residents with the countywide goal being 13.7 acres per 1,000 residents.

CHRPD currently has about 50 acres of parkland, between both, Huron and Coalinga. CHRPD also owns a 13-acre camp on the coast, but does not factor it into the level-of-service since its location is remote and far outside of the district boundaries. The District's current parkland ratio per 1,000 residents is about two acres. Together with seven acres of parkland owned by the City of Coalinga, the ratio within the District's boundaries becomes 2.3 acres, per 1,000 residents. The District reported that when the Sports Complex gets built, it would add 87 acres to the District's parkland ownership and make its parkland ratio per 1,000 residents about five.

In FY 11-12, CHRPD spent about \$29,161 in operating expenditures per acre. The NRPA Special Report indicates that among the agencies throughout the country that operated 250 acres or less of parkland and responded to the NRPA survey in 2012, a median agency

spent about \$12,467 per acre. It should be noted that the cost of operation of parkland is greatly dependent on the type of facilities made available at the park. For example, a facility with restrooms, recreation centers and recreation programs may be more costly to maintain and operate than a park that only requires occasional landscaping.

The District's recreation centers are open 135 hours per week, with Keck Community Center open 45 hours per week, the Senior Activity Center open 22.5 hours per week, and the Keenan Community Center open 65 hours per week.

One of the NRPA benchmarks calls for a maintenance labor standard of 118 staff hours per acre per year. Based on five full-time maintenance personnel, CHRPD spends about 832 maintenance hours per acre per year.¹⁰

CHRPD generally has sufficient capacity to provide adequate services to its residents. The primary constraint to capacity identified was gang activity, particularly in the Huron area. The District works in close contact with police departments of both, Coalinga and Huron, to minimize the effect of gang activity on district facilities and customers.

¹⁰ Maintenance time includes both, maintenance of parks and buildings, as the District was unable to separate the hours spent on each.

3. GOVERNANCE STRUCTURE ALTERNATIVES

Besides the status quo, there have been four governance structure alternatives identified for CHRPD, during the process of this municipal service review: 1) CHRPD acquiring parks from the City of Coalinga and the senior center from the City of Huron, 2) CHRPD dissolution with City of Coalinga or City of Huron as the successor agency, 3) CHRPD dissolution with Fresno County as the successor agency, and 4) consolidation with other special districts in the area.

CHRPD is not considering any annexations of additional territory to its boundary area. The annexation of the Camp Yeager territory, which it is serving outside of the District's bounds, is also not being considered, since it is located 100 miles away from the District, by the coast in another county.

At present, CHRPD duplicates services offered by two other providers in the area—the cities of Coalinga and Huron. The duplication in services delivered within the boundaries of CHRPD creates inherent inefficiencies and fragmented service delivery and impedes long-term planning for the delivery of park and recreation services to the residents of CHRPD. One option to eliminate this duplication is for CHRPD to take over park services provided by the City of Coalinga and recreation services provided by the City of Huron. The District already owns and maintains multiple parks, runs numerous recreation programs and has all the necessary staff and infrastructure in place to continue offering these services. Thus it appears that CHRPD has the capability and means to assume ownership of the seven acres of Coalinga parkland and Huron's senior center. This option may offer a more efficient means of providing these services as opposed to each of the cities continuing to retain maintenance staff for two small parks and one facility. This option, if considered, would require a more detailed review of resources and more thorough estimate of potential cost reductions.

Another option would be for the District's services to be transferred to another successor agency. This reorganization could take several forms, including merger with one of the cities, transition into a subsidiary district of one of the cities, or complete dissolution with another successor agency, such as the County, taking on the District's services.

A merger is defined as the termination of the existence of a district when the responsibility for the functions, services, assets, and liabilities of that district are assumed by a city.¹¹ Government Code §57104 requires that all territory of a district must be within

¹¹ Government Code §56056.

the City for which merger is proposed. In the case of CHRPD, there is a significant amount of district territory that lies outside of either of the city's boundaries; consequently merger is not a feasible option.

As a subsidiary district, CHRPD would continue to exist as a legal entity, but the City Council is designated as the ex officio board of directors of the District. The City would assume all assets, functions and governance along with all debts and liabilities of the subsidiary district. Property tax revenue presently collected by CHRPD would be guaranteed to continue to be dedicated to park and recreation services in the area. At least 70 percent of the territory within the District or 70 percent of registered voters of the District must be within the City, in order to meet legal requirements of establishing a subsidiary district.¹² In the case of CHRPD, a significant portion of the territory of the District lies outside of the cities; additionally, neither city holds 70 percent of the District's population, making this option infeasible.

Complete dissolution of CHRPD and establishment of a successor agency other than one of the cities is another option. According to Government Code §56035, dissolution means the "dissolution, disincorporation, extinguishment, and termination of the existence of a district and the cessation of all its corporate powers." Upon dissolution, LAFCo would need to identify a successor agency to implement the wind-up of the District, in accordance with Government Code §57451. In this case, the most appropriate option may be Fresno County, as it provides some park and recreation services. Under this scenario, service responsibilities, assets, and liabilities would be transferred to a successor agency in a manner that results in fund balances and revenues being segregated for the purpose of delivery of park and recreation services within the District. As the successor agency, Fresno County would receive the District's funds and assets with a term of conditions being that the funds and assets be used strictly for the services that may be provided by a park and recreation district, with all revenues and expenditures accounted for in a defined fund. Certain disadvantages exist for this option. The property taxes currently collected by CHRPD could be redistributed, unless otherwise negotiated. Additionally, there is no guarantee of continued park and recreation services in the area.

Besides the organizational challenges to this kind of reorganization, there are certain pragmatic issues that prohibit the cities from taking on the District's services. Neither of the cities have park and recreation programs of a sufficient size to take over the District's extensive parks and recreation activities, particularly given that Coalinga does not provide recreation programs and Huron does not operate or maintain any parks. While the County has extensive park infrastructure and staff in place, similar to the City of Coalinga, the County does not run any recreation programs. In addition, most of the county parks are larger regional facilities. The experience that CHRPD has building personal relationships with its residents and running local-level programs and facilities would not be easily

¹² Government Code §57105.

transferrable to the larger scale operation of the County. There also appears to be no moving reasons for the District's dissolution, given that financing is currently adequate and the District delivers a wide range of park and recreation services to its residents, appropriate to local need and demand.

The final governance structural alternative is consolidation of CHRPD with Coalinga-Huron Mosquito Abatement District and Coalinga-Huron Cemetery District, which also serve the Coalinga and Huron areas and have largely similar boundaries to the District. The three agencies could be consolidated into a single community services district (CSD) authorized to provide park and recreation, mosquito and cemetery services. Such a consolidation would eliminate two of the three governing bodies, which are struggling to maintain full boards, and may potentially allow for elimination of some duplicated administration costs and consequently a more efficient use of public funds.

4. MSR DETERMINATIONS

Growth and Population Projections

- ❖ As of 2010, the population within Coalinga-Huron Recreation and Park District (CHRPD) was 25,224.
- ❖ Based on Fresno Council of Governments growth projections, the population of CHRPD is anticipated to be 41,367 by 2050.
- ❖ A majority of the growth within CHRPD's boundaries is anticipated in the City of Coalinga.

Location and Characteristics of Any Disadvantaged Unincorporated Communities Within or Contiguous to the Sphere of Influence

- ❖ Based on the Department of Water Resources mapping system, though there are two disadvantaged communities within or adjacent to CHRPD, they consist of the two incorporated cities of Coalinga and Huron within the District. There are no Disadvantaged Unincorporated Communities within or contiguous to the Sphere of Influence.

Present and Planned Capacity of Public Facilities and Adequacy of Public Services, Including Infrastructure Needs and Deficiencies

- ❖ Two major factors influencing service demand for CHRPD are population growth and the range of recreational activities offered by the District.
- ❖ The District does not track attendance at its parks, recreational facilities or programs, except for the summer camp program. Participation in summer camp increased in 2011 and 2012, due to a decrease in fees.
- ❖ There are very few non-residents who use the District's fitness center and participate in the summer camp program. However, at Camp Yeager the number of non-resident users is about 50 percent. For all other programs, the District does not estimate the number of non-resident users.
- ❖ The District reported that in the last few years the demand for services had increased, because CHRPD widened its range of recreational opportunities and made its residents more aware of the available options.

- ❖ The District has not submitted its budget to Fresno County since at least 2004. It is recommended the District submit the budget to the County as required by law.
- ❖ The District has not submitted an audited financial statement to the County since 2007. Presently, the District is required to submit audits annually. It is recommended that the District start submitting audited financial statements to the County as required by law.
- ❖ It appears from the information provided, that the District has the capacity to accommodate the existing demand and possible future growth, due to the increase in property tax revenue in the last few years.
- ❖ The primary challenge to service provision identified by CHRPD is the gang activity in the District, particularly in the Huron area.
- ❖ CHRPD is currently starting the process of putting together a capital improvement plan (CIP). Presently, capital improvement projects are planned for on an annual basis during the budget process. There were minimal infrastructure needs identified by CHRPD, including replacement of the recreation hall at Camp Yeager and to Veteran Field bathrooms at the Olsen Park, as well as minor repairs.

Financial Ability of Agency to Provide Services

- ❖ CHRPD reported that its financing was adequate to deliver services. In FY 11-12, the District's revenues exceeded expenditures.
- ❖ The District identified a challenge associated with financing a significant capital improvement project; neither the District nor the City of Coalinga, with which the District is partnering for the development of the sports complex, have sufficient funding for the construction of the multi-million dollar facility.
- ❖ Unlike other public agencies around the State that rely on property tax revenues, CHRPD has experienced an increase in property tax revenues, due to an increase in assessed value of property within its boundaries.
- ❖ CHRPD keeps several financial reserve funds, including a contingency reserve, a donated funds reserve, assessments collected for Lighting and Landscaping Maintenance District, and a CIP reserve.
- ❖ The District's long-term debt is represented by a municipal lease agreement from 2004. At the end of FY 11-12, the long-term debt balance amounted to \$95,766.

Status and Opportunities for Shared Facilities

- ❖ CHRPD facilities are rented by other agencies for use.

- ❖ CHRPD uses the swim complex and gymnasium that belong to the Coalinga-Huron Unified School District. The school district also has about 10 acres of turf that is potentially available to the District for recreational programming.
- ❖ Coalinga Youth Sports Complex represents an opportunity for shared facilities with the City of Coalinga.
- ❖ CHRPD collaborates with other agencies through its membership in the California Park and Recreation Society (CPRS), National Recreation and Park Association (NRPA), California Association of Recreation and Park Districts (CARPD), and California Special District Association (CSDA).
- ❖ CHRPD reported that it was continuously looking for opportunities to establish agreements for shared facilities and collaboration for the mutual benefit of agencies involved.

Accountability for Community Services, Including Governmental Structure and Operational Efficiencies

- ❖ CHRPD demonstrated accountability and transparency in its cooperation with Fresno LAFCO during the service review process. The District has a website where contact and meeting information are made available to the public. CHRPD conducts outreach activities beyond the legally required ones, such as posting of agendas and minutes.
- ❖ In addition to the status quo, four governance structure options were identified with regard to CHRPD—1) CHRPD acquiring the parks from the City of Coalinga and the senior center from the City of Huron, 2) CHRPD transfer of services to the City of Coalinga or City of Huron, 3) CHRPD dissolution, with Fresno County as the successor agency, and 4) consolidation with other special districts in the area.

5. SPHERE OF INFLUENCE UPDATE

Existing Sphere of Influence Boundary

Coalinga-Huron Recreation and Park District's (CHRPD) existing SOI is coterminous with its boundaries.

SOI Options

Two options were identified with respect to CHRPD's SOI.

Option #1 – Maintain existing coterminous SOI

If the Commission determines that CHRPD should continue to exist in its present form and serve its current boundaries, then a coterminous SOI would be appropriate.

Option #2 – Adopt a zero SOI

If LAFCo desires to indicate that CHRPD should consolidate with other municipal service providers in the region or be dissolved and its operations taken over by a successor agency, a zero SOI may be appropriate.

Recommended Sphere of Influence Boundary

Since CHRPD has not identified any interest in boundary expansion and there appear to be no apparent opportunities for district expansion, it is not one of the SOI options to include additional territory in the District's sphere of influence. Should CHRPD take over the park and recreation services provided by the cities of Coalinga and Huron, an SOI expansion would not be required since the cities are already located within the District's boundaries. In addition, because Camp Yeager is located about 100 miles away from CHRPD in another county, it is not a reasonable possibility to include the camp in the District's SOI.

A zero SOI for the District is an option, which would indicate that LAFCo wishes to encourage CHRPD dissolution. Dissolution would occur in one of three cases—the City of Coalinga or City of Huron taking over CHRPD operations, Fresno County taking over the District's operations, or CHRPD consolidating with other special districts with similar boundaries. Neither city meets the legal requirements for merger with CHRPD or for the District to become a subsidiary district, making this option infeasible. In addition, due to both cities' limited park and recreation programs, they have limited available staff and equipment which would hinder Coalinga and Huron from assuming the District's operations. Additionally, there are certain pragmatic challenges to the County taking on CHRPD's services, such as the County provides park and recreation services that differ from

those provided by the District and may lack the connection with local recreational needs. Given that CHRPD provides adequate services and faces few challenges in service provision, there appears to be a lack of sufficient grounds for dissolution of the District. CHRPD appears to be in appropriate operational condition based on a healthy level of financing and the broad range of recreation facilities and programs offered that are suitable for the population served.

A zero SOI would be appropriate in the case of consolidation of the several special districts that serve the Coalinga and Huron areas and have largely similar boundaries, including the Coalinga-Huron Mosquito Abatement District, Coalinga-Huron Recreation and Park District, and the Coalinga-Huron Cemetery District. These agencies could be consolidated into a single community services district (CSD) that is authorized to provide all of these services. Such a consolidation would eliminate two governing bodies, which are struggling to maintain full boards (CHMAD and CHCD), and may potentially allow for elimination of some duplicated administration costs.

CHRPD potentially has indicated interest in the consolidation. As service reviews are completed for the other districts discussed here, these options should be considered further. It appears that it would be premature to adopt a zero SOI in anticipation of consolidation or reorganization. It is recommended that LAFCo retain the existing coterminous SOI, encourage consolidation discussions and efforts, and revisit the feasibility of these options during the next SOI update.

Proposed Sphere of Influence Determinations

Nature, location, extent, functions, and classes of services provided

- ❖ Coalinga-Huron Recreation and Park District (CHRPD) offers special events, activities, sports and recreation programs in four parks, two community centers, one fitness center, one senior center, two pools, and Camp Yeager. The District also provides the services of a Landscape and Lighting Maintenance District.
- ❖ There are no areas within CHRPD's boundaries that lack recreation and park services. In addition to facilities and programs within the boundary area, CHRPD owns and operates a camp facility 100 miles outside of the District. Facilities and programs may be used by both district residents and non-residents.

Present and planned land uses, including agricultural and open-space lands

- ❖ The County is the land use authority for the unincorporated areas. Cities are the land use authorities within the respective city boundaries. CHRPD encompasses every land use designated by the cities. In the unincorporated areas, land uses are generally agricultural with grazing lands, grain and hay crops, other field crops, orchards, and berry crops.
- ❖ Land use plans in the County and its cities include land uses and population growth, which will require continued recreation and park services. The recommended SOI does not conflict with planned land uses.
- ❖ Recreation and park services are needed in all areas, and do not, by themselves, induce or encourage growth on agricultural or open space lands. No impacts upon Williamson Act protected land will occur.

Present and probable need for public facilities and services

- ❖ Two major factors influencing service demand for CHRPD are population growth and the range of recreational activities offered by the District.
- ❖ CHRPD reported that in the last few years the demand for services had increased, because CHRPD widened its range of recreational opportunities and made its residents more aware of the available options.
- ❖ Although CHRPD is not anticipating any future growth, the District believes that if it added more recreational opportunities the number of district customers would once again increase.

Present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide

- ❖ Based on adequate financing, the wide range of recreational opportunities provided and limited challenges to service provision, it appears that CHRPD has adequate capacity to provide services to existing and anticipated future demand.
- ❖ CHRPD services appear to be adequate based on recreation center hours per week and the range of recreational opportunities. Both operating expenditures per acre and maintenance staff hours per acre per year, are higher than the national median. However, both indicators include maintenance and operations of facilities in addition to parkland.
- ❖ CHRPD's current developed parkland per 1,000 residents is lower than the District's goal and National Recreation and Park Association standard.
- ❖ Improvements could be made to the District's services by submitting budgets and audited financial statements to the County as required.

Existence of any social or economic communities of interest

- ❖ All district residents are a community of interest for CHRPD as customers benefiting from the District's services and contributors of property tax revenue to the District. Non-residents who use the District's facilities and programs are also considered a community of interest.