



CITY COUNCIL STAFF REPORT

TO: City Council **DATE:** May 11, 2026

DEPARTMENT: Community Development Department

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PRESENTER: Isaac Whippy City Manager, Valerie Stump Assistant Planner, 4LEAF

AGENDA TITLE: Discussion and Provide Direction on Code Enforcement Policy

RECOMMENDATION

Staff recommends that the City Council direct staff to implement a Hybrid Code Enforcement Model that combines complaint-based response with targeted proactive enforcement in key areas if needed, beginning with a focused pilot phase.

The pilot would build on work already underway by using proactive nuisance enforcement in the Central Business District and implementation of the Vacant Property Registry Program as test areas. This will allow the City to evaluate the effectiveness of a more proactive, strategic model and understand the workload and staffing impacts before considering any expansion.

Staff is seeking Direction on the following:

- 1. Enforcement Model** - Does Council support the Hybrid Model as the preferred direction for the Code Enforcement program, or does Council prefer a different approach?
- 2. Priorities** - Which violation types should staff prioritize when caseload exceeds capacity? For example: building and health and safety hazards, nuisance conditions, short-term rental violations, unpermitted construction, or other issue areas.
- 3. Staffing** - Does Council support exploring dedicated code enforcement staffing - either a permanent position or continued contract services - if the pilot phase demonstrates that current capacity is insufficient to meet community expectations?
- 4. Procedures and Continuity** - Does Council direct staff to prioritize the development of formal written standard operating procedures for code enforcement before expanding the scope of enforcement activity, in order to ensure program continuity regardless of staff changes?

Staff further recommends that the City Council direct staff to:

- Establish priorities and policies for all code enforcement activity.
- Develop written standard operating procedures to ensure program continuity.
- Continue and formalize proactive nuisance enforcement in the Central Business District as part of the pilot.

AGENDA ITEM NO. 8C

- Implement the Vacant Property Registry Program and integrate it into day-to-day code enforcement operations.
- Use an education-first approach to encourage voluntary compliance before pursuing penalties.
- Use the new software tools to track pilot workload, case outcomes, and geographic distribution of activity.
- Report back to Council with findings from the pilot, including whether additional staffing or other resources are needed to sustain or expand proactive efforts.

BACKGROUND

The City of Fort Bragg’s Code Enforcement (CE) program has historically been complaint-driven, responding when residents and businesses report concerns. This has allowed the City to address specific issues, but it has also led to inconsistent enforcement, slower response times, and limited ability to address broader, visible problems across the community. Over the years, the Code Enforcement program has moved between departments in an effort to improve service. It was originally in the Community Development Department, then moved to the Police Department in 2023 with grant funding from the Community Development Block Grant (CDBG) program. When that grant funding ended in 2024, the program was reduced to a part-time position and returned to the Community Development Department.

Since that time, staff have begun evaluating how to strengthen the program. This has included working with 4Leaf, Inc. to review and improve standard operating procedures (SOPs), and investing in new code enforcement and permitting software to improve case tracking, reporting, and day-to-day efficiency. With these changes in place—new software, updated procedures, and a smaller but focused program—this is a good time to step back, look at the program as a whole, and set a clear direction for the future.

Community engagement has also informed this discussion. In March 2026, the City conducted the Community Budget Priorities Survey, which included questions on code enforcement, nuisance conditions, and community appearance. A strong majority of respondents (almost 79 percent) indicated that code enforcement is either “very important” or “somewhat important” to maintaining neighborhood quality and community standards (65 “very important” and 51 “somewhat important” out of 147 responses).

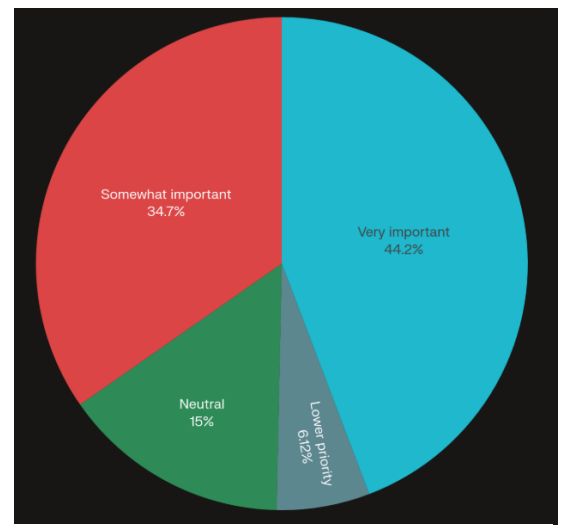
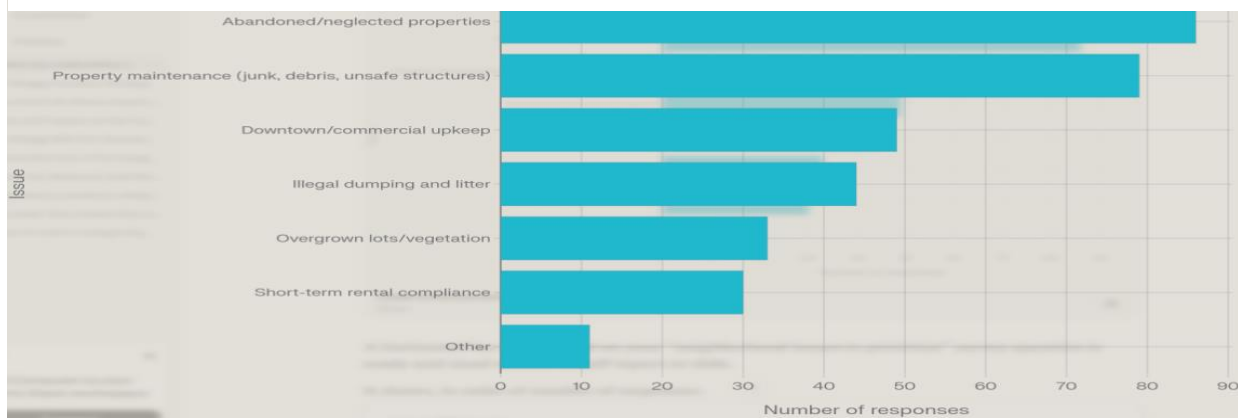


Figure 1: The Importance of Code Enforcement

The survey also highlighted top areas of concern, including abandoned or neglected properties, property maintenance issues such as junk and unsafe structures, illegal dumping and litter, and downtown and commercial property upkeep. This feedback supports a more consistent, visible, and proactive approach that focuses on nuisance and property condition issues that the community sees as most important.

Figure 2: Neighborhood Issues to Prioritize



Code Enforcement Fundamentals

Before evaluating policy options, it is important for Council to understand what code enforcement actually requires - legally, procedurally, and in terms of staff time. This context directly informs the resource and liability questions at the heart of this discussion.

A code enforcement case is not simply observing a violation and issuing a fine. Each case requires a legally defensible administrative record, due process protections, and time for voluntary compliance. The City’s authority to impose administrative fines is governed by Fort Bragg Municipal Code Chapter 1.12, adopted pursuant to California Government Code Section 53069.4. Skipping or shortcutting any required step can render a case unenforceable and expose the City to legal challenge.

A typical case moves through the following sequence:

1. Intake and Investigation. Staff receives a complaint. Staff then have to validate that complaint by verifying the violation exists. Typically this is through a site visit where Staff gathers photographic documentation, but cases often also require permit record review and identification of the responsible party. All findings are documented in the case file.

2. Courtesy Notice. Once Staff establishes a violation is present, the City’s practice has been to send an education-first notice informing the responsible party of the potential violation and providing an opportunity to correct it voluntarily. This step is not a legally actionable step, but it shows our commitment to education and voluntary compliance over punitive enforcement. In cases of immediate health and safety danger, we forgo this step and move on to step 3.

3. Notice of Violation (NOV). A formal written notice identifying the specific code sections violated, evidence of the violation, required corrective action, and a compliance deadline. The NOV must be properly served and proof of service needs to be included in the administrative record. Compliance deadlines vary by violation type and severity.

4. Re-Inspection. After the compliance deadline, staff must conduct a documented re-inspection. This step is not optional. Without it the City cannot demonstrate ongoing non-compliance and any subsequent enforcement action may be successfully challenged.

5. Administrative Citation. If non-compliance continues, staff may issue an Administrative Citation under FBMC Chapter 1.12. Each day a violation continues constitutes a separate offense. Citations must include notice of the right to appeal. If contested, the case proceeds to an administrative hearing.

6. Abatement. In cases of continued non-compliance, the City may take corrective action directly and recover costs from the property owner. Abatement requires additional legal process, including prior notice and an opportunity to be heard. Costs may be recorded as a lien against the property.

Even a case that resolves at the courtesy notice stage requires multiple documented steps. A contested case can span many months. This is why caseload volume that appears manageable on paper can quickly become unsustainable - and why written procedures, adequate staffing, and reliable case management tools are essential to program effectiveness and legal defensibility.

Code Enforcement Priorities

Effective code enforcement requires clear priorities. With limited staff capacity, it is not possible to pursue every complaint and every violation type with equal urgency. Historically, Fort Bragg's code enforcement priorities have shifted in response to changing supervision, grant-funded initiatives, and evolving Council goals resulting in a program that has been reactive not only to complaints, but to organizational circumstances. Moving forward, staff is seeking Council direction on a stable set of priorities that reflects the community's values and can guide enforcement decisions consistently over time.

Many cities, especially smaller communities with limited staff, are moving toward "strategic" code enforcement models. In these models, cities keep responding to complaints but also do some targeted proactive work in locations or issue areas that have the most impact, such as key corridors, blighted properties, or health and safety concerns.

Common best practices include:

- Using data and mapping to decide where to focus limited staff time.
- Emphasizing compliance and problem-solving rather than fines and punishment.
- Coordinating with other departments, such as Police, Fire, Public Works, and Planning.
- Providing clear information and outreach so residents and businesses understand the rules and process.

Many communities also emphasize equity in enforcement. That means trying to avoid a situation where only the most vocal neighborhoods get attention, and instead making sure all parts of the city receive fair and consistent service. Some cities partner with nonprofits and community organizations to connect property owners and tenants with help, such as repair assistance or social services, when that is appropriate.

Fort Bragg's recent steps—new software, outside review of procedures, and consideration of a hybrid model—are consistent with these best practices and position the City to move toward a more modern, community-focused approach.

This report presents options for evolving the City's Code Enforcement program and asks the City Council to provide direction on future priorities.

DISCUSSION AND ANALYSIS

The City is at a turning point in code enforcement. Recent organizational changes, new technology, and outside procedural review create an opportunity to move from a reactive system toward a more consistent, proactive, and legally sound program. The question before Council is not whether to improve - but how, and at what pace.

The complaint-driven model has three core limitations. First, enforcement is inherently uneven - neighborhoods that generate fewer complaints receive less attention, even when conditions are similar. Second, staffing constraints mean slower response times and limited capacity for follow-up or proactive work. Third, the absence of written procedures creates continuity risk: when staff changes, institutional knowledge is lost, and the program loses consistency.

With only part-time staffing, it is difficult to respond quickly to all complaints or to conduct regular inspections. This keeps the City in a reactive mode, dealing with problems after they surface instead of preventing them or catching them earlier.

New software tools can help change this. They allow staff to track cases more clearly, see patterns and trends, and use limited time and resources where they will make the most difference. The review by 4Leaf has also provided ideas for clearer procedures and better coordination among departments.

The City's existing work on proactive nuisance enforcement in the Central Business District and the new Vacant Property Registry Program are early examples of a more strategic approach. These efforts can serve as pilots and building blocks for a broader hybrid model.

Current Challenges

A. Complaint-driven limitations

Because the program depends on complaints:

- Some areas may see more enforcement than others.
- Obvious or ongoing issues may go unaddressed if no one complains.
- Residents may feel enforcement is inconsistent or unfair.

B. Staffing constraints

With only a part-time position, response times are slower, and staff have limited capacity for follow-up and proactive work.

C. Public perception

Some members of the public see code enforcement as punitive. This can discourage people from reaching out early and can make voluntary compliance harder to achieve. Other members of the public see code enforcement as ineffective. Complainants do not fully understand the constraints the department is working under and often are wanting their complaint addressed immediately.

Opportunities for Improvement

A. Investment in technology

The new software will help staff:

- Track and prioritize cases.
- Identify “hot spots” and repeat problems.
- Provide clearer, more regular reporting to Council and the public.

B. Operational review

The work with 4Leaf has highlighted ways to:

- Clarify and streamline standard operating procedures.
- Improve how cases move from complaint to resolution.
- Coordinate better with other City departments.

Policy Options

Option 1: Maintain current complaint-driven model

Under this option, the City would keep the existing system with a part-time Code Enforcement Officer and make only minor operational improvements.

Pros:

- No new cost.
- The system is already familiar to staff and the community.

Cons:

- Inconsistency would likely continue.
- The City would remain largely reactive, with limited ability to prevent problems.
- Some areas/complaints may feel underserved if they do not generate many complaints.

Option 2: Hybrid model (Recommended)

Under this option, the City would keep responding to complaints but also add targeted proactive enforcement in priority areas.

Key elements:

- Focus proactive work on downtown, major corridors, and other key locations.
- Prioritize issues that affect health, safety, and the City's appearance.
- Use data from the software to decide where and how to focus limited staff time.
- Emphasize education and voluntary compliance before moving to penalties.
- Coordinate with other departments and, when helpful, with community partners.

Pros:

- Balanced approach that can be implemented with existing resources.
- Improves consistency and visibility.
- Aligns with common best practices used by other small cities.

Cons:

- Requires additional staff to adjust workflows and set clear priorities.
- Requires clear communication to the public about the new approach.

Option 3: Fully proactive program

Under this option, the City would move to regular inspections across the entire community and significantly expand staffing.

Pros:

- Provides the most consistent and comprehensive level of service.
- Allows for early identification and prevention of problems.

Cons:

- Would require additional staffing and budget.
- May exceed current community expectations and financial capacity.

The hybrid model is recommended because it offers clear improvements in fairness, visibility, and effectiveness while staying within current resources. It also gives the City a platform to grow the program later if needed and if funding allows.

Measuring success

To understand whether the changes are working, staff would track and report:

- How many cases come from complaints versus proactive work.
- How long it takes to respond to and resolve cases.
- How often issues are resolved through voluntary compliance.
- Where cases are located, to help monitor fairness across neighborhoods.
- General community feedback and any trends in concerns about enforcement.

FISCAL IMPACT

At this time, staff believe the hybrid model can be implemented within existing resources by reallocating staff time and using the new software to improve efficiency.

The City will use the initial implementation of the Vacant Property Registry Program and proactive nuisance enforcement in the Central Business District as a practical test phase. This will allow staff to evaluate workload, case volume, follow-up demands, and administrative impacts before determining whether additional staffing resources are needed.

If these pilot efforts show that a broader proactive program creates a sustained increase in workload beyond current capacity, staff will return to Council with information on resource needs, including potential staffing, training, and ongoing software support.

CONSISTENCY

This item supports the City's Strategic Plan by:

- Promoting community pride and quality of life
- Supporting economic development and downtown revitalization
- Advancing organizational efficiency through technology
- Reinforcing the City's role as a facilitator and community partner

COMMUNITY ENGAGEMENT

Community engagement has also informed this discussion. In March 2026, the City conducted the Community Budget Priorities Survey, which included questions on code enforcement, nuisance conditions, and community appearance with 147 respondents.