

Mono County Local Agency Formation Commission

PO Box 347
Mammoth Lakes, CA 93546
760.924.1800, fax 924.1801
commdev@mono.ca.gov

PO Box 8
Bridgeport, CA 93517
760.932.5420, fax 932.5431
<https://monocounty.ca.gov/lafco>

REGULAR MEETING AGENDA

April 9, 2026 – 3:00 pm

**Mono County Civic Center – Dana Room
1290 Tavern Rd. Mammoth Lakes, CA
Alternate meeting locations with Commissioner present:
824 Burcham Flat Road Coleville, CA**

The meeting may be joined by video at <https://monocounty.zoom.us/j/84021607620?pwd=8mNe4jMWFrJxziX1mGfpW9X2QFAjwL.1> or by telephone at: 669-900-6833 (**Meeting ID#** is 840 2160 7620, **password** 98765) where members of the public shall have the right to observe and offer public comment. An alternate method to access the video meeting is <http://zoom.us/join> and enter Meeting ID: 840 2160 7620, password 98765.

1. CALL TO ORDER/PLEDGE OF ALLEGIANCE

2. Public Comment

3. Appoint Officers, Membership (pg. 1)

4. Review and Approve Minutes

Review and approve regular meeting minutes of October 10, 2025 (pg. 3)

5. 3:00 PM PUBLIC HEARING: Fiscal Year 26/27 Preliminary Budget (pg. 5)

6. LAFCO Business

- A. LAFCO 101 Training
- B. District inactivity report (pg. 9)
- C. MSR Update (pg. 12)

7. Executive Officers Report

8. Commissioner Reports

9. Upcoming Agenda Items

- A. Final FY 26/27 Budget

10. ADJOURN to June 11, 2026.

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April 09, 2026

To: Mono LAFCO

RE: LAFCO Membership Update

Recommendation: Receive staff report

Background:

Mono County LAFCO is a seven-member commission composed of members from the Mammoth Lakes Town Council, Mono County Board of Supervisors, Special District Members, and Public Members (with one alternate for each member position). The appointed term of office on Mono LAFCO is four years, expiring on the first Monday in May. Additionally, a Chair and Vice-Chair are appointed by LAFCO and serve for a period of one year from the selection. See below for the current LAFCO membership roster, currently there is one vacancy (Public Member Alternate), and one term expiration (Special District Member) that need to be addressed, as well as the annual appointment of LAFCO Chair and Vice-Chair.

LAFCO MEMBERSHIP ROSTER

	Member	Title	Term Expiration
1	Jennifer Kreitz	County Member	-
2	Paul McFarland	County Member (Vice Chair)	-
	Rhonda Duggan	County Member (Alternate)	-
3	Brent Truax	City Member	-
4	Bill Sauser	City Member	-
	Christine Bubser	City Member (Alternate)	-
5	Tom Cage	Special District Member (Chair)	May, 2026
6	Jeffery Sutch	Special District Member	May, 2028
	Gary Thompson	Special District Member (Alternate)	May, 2028
7	Bruce Woodworth	Public Member	May, 2028
	VACANT	Public Member (Alternate)	

Discussion:

Special District Member

The nominations and election process for the Special District Members will be conducted by electronic mail per Government Code (GC) Section 56332 (f)(3)(4). Each Special District may submit nominations in writing (LAFCO staff will provide a nomination form).

Candidates for this position must be elected or appointed by their own Special District officers residing within the county. Notices will be sent via electronic mail in April with a 21-day response deadline in May (due before LAFCO's June meeting).

If only one candidate is nominated per vacant seat, that candidate shall be deemed appointed as permitted by GC Section 56332 (c)(1)(2). If more than one Special District Member has been nominated, the Executive Officer will prepare a ballot and send one copy to each Special District via electronic mail (per GC Section 56332 (f)(3)(4)), along with voting instructions. The candidate receiving the highest number of votes will be appointed as the Special District member at the June LAFCO meeting.

Public Member Alternate

Notice of the Public Member Alternate vacancy will be published in a newspaper of record and advertised through Mono County social media with a minimum of 21-day response deadline (due before LAFCO's June meeting). Public Members cannot be an officer or employee of the county or any city or district with territory in the county.

Appointment of the public member and alternate public member shall be subject to the affirmative vote of at least one of the members appointed by each of the other appointing authorities (City Member, County Member, and Special District Member).

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Draft minutes

October 2, 2025 – 3:00 pm

**Mono County Civic Center – Dana Room
1290 Tavern Rd. (Mono Lake Room) Mammoth Lakes, CA
Alternate meeting locations with Commissioner present:
824 Burcham Flat Road Coleville, CA
550 Mono St. A201 Mammoth Lakes, CA
3590 Main Street Mammoth Lakes, CA**

<https://monocounty.zoom.us/j/88252152547?pwd=MESAmZKVCVs0jXGztxBrnFy2sbYvb.1>

1. **CALL TO ORDER/PLEDGE OF ALLEGIANCE-** Called to order at 3:03 pm and the Commission lead the pledge of allegiances.
2. **PUBLIC COMMENT-** No public comment.
3. **CONSENT ITEMS**
 - A. Review and approve regular meeting minutes of June 12, 2025
Motion: Approve the minutes from June 12, 2025 as presented.
Sutch motion; McFarland second.
Roll-call vote – Ayes: Rice, Sutch, Woodworth, McFarland, Cage. Abstain: Duggan
Motion Passes 5-0 with one abstention.
4. **3:00 PM PUBLIC HEARING: ADOPTION OF MSR for CSA 1 & CSA 5**
 - Calloway provided a overview of the MSR for CSA 1 and CSA 5 and answered questions from the Commission.
 - Public hearing opened
 - No public comment
 - Public hearing closed

Motion: Direct staff to file a categorical exemption in accordance with CEQA guidelines §15306 and, Adopt resolution R25-02, adopting the 2025 CSA #1 MSR SOI and the 2025 CSA #5 MSR SOI.
McFarland motion; Duggan second.
Roll-call vote – Ayes: Rice, Sutch, Woodworth, McFarland, Duggan, Cage.
Motion Passes 6-0.

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5. LAFCO BUSINESS

A. Continue Review Spheres of Influence

- Calloway presented the review of Spheres of Influences and answered questions from the Commission.

6. EXECUTIVE OFFICER'S REPORT

- No executive officer's report.

7. COMMISSIONER'S REPORTS

- No Commissioner's reports.

8. UPCOMING AGENDA ITEMS

9. ADJOURN at 5:07pm to Spring 2026.

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April 9, 2026

To: Mono County LAFCO

From: Brent Calloway, Executive Officer

RE: FY 26-27 Preliminary Budget

Recommendation

Review preliminary budget, provide any desired direction to staff on draft Fiscal Year 2026-27 budget, and adopt preliminary FY 26-27 budget.

Background

This is a public hearing item. After staff presentation and questions of staff by the Commission, open the public hearing and take any comments, deliberate, and provide direction to staff.

Alternative Apportionment

The Cortese-Knox-Hertzberg Act (CKH) establishes methods for apportioning LAFCO staffing and program costs among the County, Town and Special Districts. The law allows alternative apportionment methods, which Mono LAFCO has used to avoid impacting financially constrained special districts. Prior to using an alternative apportionment method, LAFCO costs were fully borne by the Town of Mammoth Lakes and Mono County. In recent years, the Commission applied an alternative apportionment method consisting of a third from Mono County; a third from the Town of Mammoth Lakes; and a third from special districts, with the special district share provided exclusively from the Southern Mono Healthcare District and the Mammoth Community Water District, rather than from all independent special districts. The proposed preliminary budget reflects this same alternative budget apportionment method.

FY 25-26 Budget Review

Summary of FY 25-26 Mono LAFCO activity.

Adopted MSRs for Mammoth Lakes Fire Protection District, County Service Areas 1 & 5.
Comprehensive Review of Spheres of Influence for all Special Districts.
Adopted response to Mono County Civil Grand Jury investigation.
Prepared public draft MSR for Mammoth Lakes Mosquito Abatement District.
Conducted research and prepared Commission recommendations on Inactive Districts.
Staff attending CALAFCO staff workshop (May 2026).
Participated in CALAFCO regular business (list serve, training, legislation tracking).
Supported Mono County Public Works grant application.
Responded to Public Records Act request regarding ongoing litigation.
Completed US census boundary and annexation survey.

Met with representatives of the California Special District Association.

Proposed FY 26-27 Budget

The proposed preliminary budget reflects status quo administrative functions of Mono LAFCO in FY 26-27. Budget amendments may be considered, including additional revenue collection, based on future policy discussions. LAFCO administrative activity in FY 26-27 is expected to be similar to FY 25-26. There are several potential special district applications that could be submitted and require LAFCO action, however, project applicants are being advised that the Mono LAFCO budget is not intended to cover project processing costs and that Mono LAFCO intends to seek full cost recovery for projects initiated by applicants.

Proposed Administrative Expenditures

The proposed preliminary budget includes a 3% increase to contract services that reflects the 3% cost of living increase received by Mono County staff. A small increase is also proposed for Membership Fees to reflect actual costs. There is no proposed contribution to the reserve fund. As per the long-standing policy, any unused expenditures will be automatically rolled into the reserve fund. Projected unused expenditures for FY25/26 are \$1,000 as not all of the \$3,000 travel budget is projected to be expended. The proposed preliminary budget maintains the \$3,000 travel budget enabling 1 staff member and 1 commissioner to attend the CALAFCO staff workshop or annual conference, however an increase to \$4,000 may be considered as travel and conference costs continue to rise. The proposed preliminary budget maintains membership in CALAFCO.

Proposed Revenues & Reserve

The proposed budget continues the long-standing practice of matching proposed revenues with proposed expenditures. One third of revenue is collected from both the County and Town \$3,891 and Mammoth Water District and Southern Mono Health Care District splitting the other third at \$1,945 each. This budget continues the practice of depositing any unexpended revenue into the reserve fund. The projected reserve fund balance for FY 26-27 is \$14,644 or approximately 125% of annual operating costs.

Please contact Brent Calloway at 760-924-1805 or bcalloway@mono.ca.gov with any questions.

Attachments:

1. Proposed Preliminary FY 26-27 budget spreadsheet.
2. Public Hearing Notice.

Mono LAFCO Preliminary Budget FY 26/27

Revenue	FY 23/24	FY 23/24	FY 24/25 Approved	FY 24/25 Actual	FY 25/26 Approved	FY 25/26 Projected	FY 26-27 Preliminary
Mono County	3,715	3,715	5,451	5,451	3,817	3817	3891
TOML	3,715	3,715	5,451	5,451	3,817	3817	3891
SMHCD	1,857	1,857	2,725	2,725	1,908	1908	1945
MCWD	1,857	1,857	2,725	2,725	1,908	1908	1945
Application Fees	1,000	495	0	0	0	0	0
Withdraw from Reserve	7,871	7,871	0	0	0	0	0
Total	20,015	19,510	16,352	16,352	11,450	11450	11672
Expenditures							
Contract Services	15,415	15,415	6,600	6,600	6,800	6800	7004
Membership Fees	1,300	1,348	1,400	1,425	1,450	1450	1468
Publications	300	150	150	188	200	150	200
Travel & Training	3,000	980	3,000	1,424	3,000	1945	3000
Contribution to Reserve	0	1,617	5,202	6,715	0	1105	0
Total	20,015	19,510	16,352	16,352	11,450	11450	11672
Reserve							
Beginning Balance	11,746	4,025	5,792	5,792	12,789	13039	14394
Contributions	0	1,617	5,202	6,715	0	1105	0
Interest Earned	150	150	150	282	250	250	250
Withdraw	-7,871	0	0	0	0	0	0
Ending Balance	4,025	5,792	11,144	12,789	13,039	14394	14644

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March, 16, 2026

To: The Mammoth Times

From: Heidi Willson

Re: Legal Notice for **March 13 edition**

Invoice: Heidi Willson, PO Box 347, Mammoth Lakes, CA 93546

NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN that Mono County Local Agency Formation Commission (LAFCO) will hold a Regular Meeting and conduct a public hearing on **April 9, 2026 at 3:00 p.m.** in the Mono County Civic Center, Dana Room (2nd Floor), 1290 Tavern Road in Mammoth Lakes and remotely by live cast at <https://monocounty.zoom.us/j/81605728150?pwd=tPjYVdcajKppKP1u5tfteKTb8qI226.1> A preliminary budget for the 2026/27 fiscal year will be considered and changes shall be made to the budget based on input at this meeting. A public hearing to adopt the final budget will be held in June. For more information, contact Heidi Willson at 760-924-1804 or hwillson@mono.ca.gov or the LAFCO website: <https://monocounty.ca.gov/lafco>.

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INACTIVE DISTRICTS STAFF REPORT

April 9, 2026

To: Mono County LAFCO
From: Erin Bauer, Planning Analyst

RECOMMENDATION

Receive updates on CSA #2, Mammoth Lakes Community Services District, Antelope Valley Water District, and Mono County Resource Conservation District. Consider next steps.

CSA #2

BACKGROUND & DISCUSSION

Mono County CSA #2 was established in 1977 for the purpose of providing television service to the residents of Benton, Chalfant and Hammil Valleys. Unlike CSA1, CSA #2 did not receive a portion of the 1% ad valorem property tax. CSA #2's only revenue source was a \$50.00 per year fee charged to users of digital TV service within the CSA #2 service area. This fee was added to residents' property tax bills, but those not utilizing the service could have the charge removed. CSA #2 was not authorized to provide any service or facility other than television service.

As digital television service became obsolete, it also became increasingly difficult to maintain and repair the equipment necessary to provide it. After considering the costs and benefits required to maintain service, the CSA #2 advisory board recommended that service be discontinued.

On August 6, 2019, the Board of Supervisors adopted Minute Order M18-184:

Discontinuance of Digital TV Service within CSA #2 Service Area

1. Based on the recommendation of the CSA #2 advisory board, direct that the County's provision of digital TV service within the CSA #2 service area be discontinued. 2. Direct staff to take such steps and may be necessary to: (a) decommission and/or remove television equipment from leased sites; (b) remove any charge to CSA #2 residents for TV service for any period in which TV service is not provided, including the present fiscal year; and (3) take necessary steps to dissolve CSA #2 through the Local Agency Formation Commission (LAFCo) process.

In 2019, when service was discontinued, the balance in the CSA #2 account was \$238,346 and the minute order permitted these funds to be used to decommission and/or remove television equipment from leased sites.

CSA#2 currently has \$277,012 in its account. The account does earn interest (\$9,583 in 2025).

RECOMMENDATION

Verify that all leased sites have been properly decommissioned. Formally dissolve the district. Redirect remaining funds.

MAMMOTH LAKES COMMUNITY SERVICES DISTRICT (MLCSD)

BACKGROUND & DISCUSSION

The MLCSD operates on revenues derived from special assessments/direct charges levied on residents' annual property bills. The district uses those revenues primarily for street maintenance expenses, such as slurry, crack and seal repairs, and snow removal.

MLCSD is an active district, with two board members. The most recent audit shows a revenue of \$32,804 in 2021, \$29,983 in 2022, and \$32,208 in 2023. Expenditures for those same years were \$30,123 in 2021, \$26,325 in 2022, and \$117,995 in 2023. Remaining funds in the MLCSD account, at the end of 2023, totaled \$35,253.

Variation in expenditures suggests discretion and forward planning, rather than automation. However, oversight is limited.

RECOMMENDATION

Assemble more information. Consider preparing an MSR.

ANTELOPE VALLEY WATER DISTRICT

BACKGROUND & DISCUSSION

The Antelope Valley Water District (AVWD) is largely but not wholly inactive. Its primary function is irrigation, not municipal water supply. The district is also able to seek grant funding for infrastructure improvements and repairs that would not be available to a mutual water company. Presently, the Board of the AVWD have indicated that, due to the evolving water issues in the Antelope Valley, they see a potential need for a local agency with water service availability in the future.

Audits are completed every five years, and the most recent audit covers 2018-2022. The district's account earns interest only, and the only expense on budget during the most recent audit is a \$1,700 charge in 2018. Funds in the account totaled \$54,252 in 2018 and rose to \$57,975 in 2022.

RECOMMENDATION

Consider preparing an MSR. A dissolution is not recommended.

MONO COUNTY RESOURCE CONSERVATION DISTRICT

LAFCO COMMISSIONERS

Jennifer Kreitz, Paul McFarland (Vice Chair), Rhonda Duggan, Brent Truax, Bill Sauser, Christine Bubser (Alternate), Tom Cage (Chair), Jeffrey Sutch, Gary Thompson (Alternate) Bruce Woodworth

BACKGROUND & DISCUSSION

The Mono County Resource Conservation District (MCRCD) is dedicated to supporting sustainable land and natural resource management. The district originated with efforts by the Soil Conservation Service (SCS) to map and describe soils across the country, in the wake of the Dust Bowl. The Soil Conservation Service eventually became the National Resource Conservation Service (NRCS) and many SCS districts incorporated as RCDs.

The MCRCD works to protect and improve the region's natural resources through conservation efforts, educational outreach, and collaborative partnerships with landowners, agencies, and community organizations. Its focus areas often include soil conservation, water management, forest health, habitat restoration, and erosion control, among others.

The MCRCD is presently inactive. In 2018 expenses amounted to \$4,650, then dwindled over the following years: \$984 in 2019, \$892 in 2020, \$476 in 2021 and \$0 in 2022. Audits are completed every five years, and the most recent audit covers 2018-2022. The district has no revenue aside from the interest earned on the account. Funds in the district account totaled \$31,823 in 2019 and \$31,549 in 2022.

RECOMMENDATION

Consider surveying for interest in reviving the district. Consider an MSR.

LAFCO COMMISSIONERS

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April 09, 2026

To: Mono LAFCO

RE: MSR Update Status

Recommendation: Receive staff report

Background:

Since 2023 Mono LAFCO has been working on updates of the original 2008/2009 service review reports (MSRs). As we have made progress, our strategy to complete all the updates has evolved for many reasons including financial constraints, expected quality of final products and the legal requirements to update the documents. At the June and October 2025 meetings, the Commission reviewed the Spheres of Influence for all special districts in the County that did not have an updated MSR and directed staff to finish a draft MSR for the Mammoth Lakes Mosquito Abatement District and develop a strategy for continued progress on the remaining updates to the April 2026 meeting.

Mammoth Lakes Mosquito Abatement District (MLMAD) MSR

We began working on the MLMAD MSR in 2023 as Bauer Environmental was contracted to complete MSRs for the special districts in the vicinity of the Town of Mammoth Lakes. A draft was completed in 2024 and reviewed by the district but was not released for public review. Since that time, we have uncovered some additional issues with the district that warrant further investigation. We have completed a draft that is suitable for public review, but hope to further investigate these issues before bringing a final draft to the Commission for adoption. The two issues are: (1) conflicting information about the existing district boundaries and (2) new information about district funding and annexation requirements related to the Snowcreek VIII project.

Additional MSR work anticipated for 2026 – 2027

During the comprehensive review of all district Spheres of influence, several potential options for continued MSR progress in the next year were discussed. The Commission directed staff to investigate several very small districts that may be low hanging fruit for MSR development or possibly even LAFCO action such as dissolution or reorganization. Staff is seeking direction that may include direction to proceed with MSR development for these districts (agenda item 6.b).

The Commission also directed staff to begin thinking about how to update the Fire District MSRs as all of the unincorporated County fire district MSRs have been updated and the 9 fire districts in the County represent a significant portion of the remaining MSR update work. After some research, staff is proposing that we begin working on the Bridgeport FPD MSR. The Bridgeport FPD sphere and district boundary were identified in the comprehensive sphere review process as the most irregular of all the fire districts and would benefit most from a large-scale SOI update and future annexation.

In addition, the district Chief is enthusiastic about the potential for an MSR update (and potential future annexations) and willing to help with the process. Staff is seeking direction from the Commission.

Completed MSRs

2025 Mammoth Lakes Fire Protection District
 2025 County Service Area 1
 2025 County Service Area 5
 2024 Bridgeport Public Utility District
 2024 Hilton Creek Community Services District
 2024 Lee Vining Public Utility District
 2024 June Lake Public Utility District
 2024 Wheeler Crest Community Services District
 2023 Birchim Community Services District

Public Review Drafts

2026 Mammoth Lakes Mosquito Abatement District

Incomplete Drafts

Mammoth Community Water District
 Southern Mono Hospital District
 Town of Mammoth Lakes

Inactive District Research

Mammoth Lakes Community Services District
 County Service Area 2
 Antelope Valley Water District
 Mono County Resource Conservation District

2009 MSRs

Antelope Valley Fire Protection District
 Bridgeport Fire Protection District
 Mono City Fire Protection District
 Lee Vining Fire Protection District
 June Lake Fire Protection District
 Long Valley Fire Protection District
 Wheeler Crest Fire Protection District
 Paradise Fire Protection District
 Chalfant Fire Protection District & Community Services District
 White Mountain Fire Protection District
 Countywide Service Area

MAMMOTH LAKES MOSQUITO ABATEMENT DISTRICT

MUNICIPAL SERVICE REVIEW



Draft Report | April 9, 2026

PREPARED BY:

Mono County Local Agency Formation Commission
PO Box 347
Mammoth Lakes, CA 93546
(760) 924-1800, fax (760) 924-1801
commdev@mono.ca.gov

PREPARERS:

Project Oversight: Brent Calloway, LAFCO Executive Officer
Project Manager: Kelly Karl, Planning Analyst
Staff: Erin Bauer, Planning Analyst

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GLOSSARY OF TERMS

ACS – American Community Survey
 CalEPA – California Environmental Protection Agency
 CDPH – California Department of Public Health
 CKH – Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000
 DDT – Dichlorodiphenyltrichloroethane, an insecticide banned in the USA since 1972. https://www.cdc.gov/biomonitoring/DDT_FactSheet.html
 DOF – California Department of Finance
 DUCs – Disadvantaged Unincorporated Communities
 EEE – Eastern Equine Encephalitis
 LAFCO – Local Agency Formation Commission
 MLMAD – Mammoth Lakes Mosquito Abatement District
 MSR – Municipal Service Review
 OVMAP – Owens Valley Mosquito Abatement Program
 SOI – Sphere of Influence
 SLEV – St. Louis Encephalitis Virus

LIST OF FIGURES & TABLES

Figure 1: Town of Mammoth Lakes municipal boundaries, including the airport property.
 Figure 2: MLMAD highlighted in yellow, circa 1975.
 Figure 3: MLMAD Tax Zones.
 Figure 4: 1989 District Map.
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I. EXECUTIVE SUMMARY

Described by the Centers for Disease Control as “the world’s deadliest animal”ⁱ because of their ability to transmit deadly diseases, mosquitoes pose an increasing danger to the Town of Mammoth Lakes. Increasing urbanization favors mosquitoes with a preference for human hosts while climate change extends the mosquito season.

The Mammoth Lakes Mosquito Abatement District (MLMAD) was formed in 1969 to suppress mosquito populations in the Old Mammoth area. Since 1990, LAFCO reviews of the MLMAD have recommended dissolving the district, noting that its services would be provided more economically and efficiently by the Town of Mammoth Lakes.

In 2013, the MLMAD disbanded its local facilities and contracted with the Owens Valley Mosquito Abatement Program (OVMAP) for services. As predicted, disbanding local facilities reduced costs and improved district finances. Board Members of the MLMAD report that residents are satisfied with the quality of the OVMAP’s service, and the contract was renewed a second time in 2024, for a third five-year term.

Further improvements could be made by dissolving the district. The MLMAD’s current district boundaries are limited, but include the majority of naturally occurring local mosquito breeding sources. Nevertheless, the efficacy of any mosquito abatement treatment is mitigated by the fact that mosquitoes can travel. They can travel from untreated residential areas, or from untreatable wild land areas and wilderness.

As of March 2026, while Californians in neighboring counties occasionally test positive for the most common and serious mosquito vector-borne diseases in California—West Nile Virus and St. Louis Encephalitis—there have been no reported positive human cases of either in Mono County.

II. DETERMINATIONS

2.1 MSR DETERMINATIONS

GROWTH AND POPULATION PROJECTIONS FOR THE AFFECTED AREA (SEE 4.1)

- Urbanization favors mosquitoes that live near and feed on humans, while causing other species to decline.
- The population of Mammoth Lakes declined between the 2010 and 2020 Census, and is projected to hold steady over the next decade.

LOCATION & CHARACTERISTICS OF ANY DISADVANTAGED UNINCORPORATED COMMUNITIES IN OR CONTIGUOUS TO THE SPHERE OF INFLUENCE. (SEE 4.2)

- No part of the Town of Mammoth Lakes, nor any area contiguous to it, is designated as a Disadvantaged Unincorporated Community (DUC).

PRESENT AND PLANNED CAPACITY OF PUBLIC FACILITIES, ADEQUACY OF PUBLIC SERVICES, AND INFRASTRUCTURE NEEDS OR DEFICIENCIES INCLUDING NEEDS OR DEFICIENCIES RELATED TO SEWERS, MUNICIPAL AND INDUSTRIAL WATER, AND STRUCTURAL FIRE

PROTECTION IN ANY DISADVANTAGED, UNINCORPORATED COMMUNITIES WITHIN OR CONTIGUOUS TO THE SPHERE OF INFLUENCE. (SEE 4.3)

- In 2013, MLMAD disbanded local operations and contracted with Owens Valley Mosquito Abatement Program for service. The district renewed this initial five-year contract in 2018 and again in 2024.
- The majority of mosquito-borne illness is spread by mosquitoes that have evolved to specialize in biting humans, and mosquitoes can identify hosts by odor.
- The OVMAP focuses its efforts on killing mosquito larvae and pupae before they grow into biting adults. Effective larvicide requires deep knowledge of the terrain and of mosquito development.
- Mosquitoes can travel to population centers from breeding grounds in inaccessible wilderness, inaccessible snowmelt, and on private property.
- A five-member Board of Trustees governs the MLMAD. The Board meets as needed, usually twice a year. Maintaining a full Board has proved challenging.

FINANCIAL ABILITY OF AGENCIES TO PROVIDE SERVICES. (SEE 4.4)

- Switching from a local operation to a contract with OVMAP resulted in significant cost savings, reversed a trend where yearly expenses exceeded revenues, and allowed the district to build substantial reserves.
- The district is funded by property taxes.
- The MLMAD's reliance on contract services necessitates a substantial emergency reserve fund. Should the contract not be renewed the MLMAD must be able to quickly arrange personnel, equipment, and facilities from scratch.

STATUS OF, AND OPPORTUNITIES FOR, SHARED FACILITIES. (SEE 4.5)

- All facilities and equipment currently being used for abatement activities belong to OVMAP.

ACCOUNTABILITY FOR COMMUNITY SERVICE NEEDS, INCLUDING GOVERNMENTAL STRUCTURE AND OPERATIONAL EFFICIENCIES. (SEE 4.6)

- MLMAD meets as required by law, maintains a page on the Mono County website where up-to-date contact information can be found, and the most recent budget includes a financial audit.

ANY OTHER MATTER RELATED TO EFFECTIVE OR EFFICIENT SERVICE DELIVERY, AS REQUIRED BY COMMISSION POLICY. (SEE 4.7)

- Annexation requirements related to the Snowcreek VIII development project are unclear and new information regarding direct funding of the district by the Town of Mammoth Lakes requires further investigation.
- The currently accepted district boundaries may be inaccurate. A prudent assumption is that the district boundaries never expanded beyond the tax areas which fund it. If true, abatement work has been ongoing outside of the district boundaries for decades and an annexation study should be conducted.

2.2 SPHERE OF INFLUENCE FINDINGS

THE PRESENT AND PLANNED LAND USES IN THE AREA, INCLUDING AGRICULTURAL AND OPEN-SPACE LANDS (SEE 5.1)

- The Mosquito Abatement District is wholly contained within the Town of Mammoth Lakes, an incorporated community in southwest Mono County, in the eastern Sierra Nevada.

THE PRESENT AND PROBABLE NEED FOR PUBLIC FACILITIES AND SERVICES IN THE AREA. (SEE 5.2)

- The primary purpose of a mosquito abatement district is to suppress mosquito-borne diseases.
- Species of mosquito known to carry serious diseases are regularly found in Mono County.
- Every year, Californians in neighboring counties test positive for West Nile Virus and St. Louis Encephalitis.

THE PRESENT CAPACITY OF PUBLIC FACILITIES AND ADEQUACY OF PUBLIC SERVICES THAT THE AGENCY PROVIDES OR IS AUTHORIZED TO PROVIDE. (SEE 5.3)

- A dead bird tested positive for West Nile Virus in Mono County in 2010. As of March 2026 no further positive results have been reported to the California Department of Public Health.
- The MLMAD through OVMAP, has the facilities, staff, and equipment to suppress mosquito populations within the district boundaries.

THE EXISTENCE OF ANY SOCIAL OR ECONOMIC COMMUNITIES OF INTEREST IN THE AREA IF THE COMMISSION DETERMINES THAT THEY ARE RELEVANT TO THE AGENCY. (SEE 5.4)

- Communities of Interest are used to draw legislative districts.
- At present, there are no Communities of Interest relevant to mosquito abatement within the Sol.

FOR AN UPDATE OF A SPHERE OF INFLUENCE OF A CITY OR SPECIAL DISTRICT THAT PROVIDES PUBLIC FACILITIES OR SERVICES RELATED TO SEWERS, MUNICIPAL AND INDUSTRIAL WATER, OR STRUCTURAL FIRE PROTECTION, THAT OCCURS PURSUANT TO SUBDIVISION (G) ON OR AFTER JULY 1, 2012, THE PRESENT AND PROBABLE NEED FOR THOSE PUBLIC FACILITIES AND SERVICES OF ANY DISADVANTAGED UNINCORPORATED COMMUNITIES WITHIN THE EXISTING SPHERE OF INFLUENCE. (SEE 5.5)

- The Mosquito Abatement District does not provide sewer, municipal or industrial water, or structural fire protection.

2.3 SPHERE OF INFLUENCE RECOMMENDATION

The existing Sphere of Influence is coterminous with the boundary of the Town of Mammoth Lakes. A Sphere of Influence is intended to show the intended extent of a district. The best way to provide mosquito abatement to the entirety of the incorporated area would be to dissolve the MLMAD and transfer the responsibility to provide mosquito abatement services to the Town.

2.4 REORGANIZATION RECOMMENDATION

Two previous Sphere of Influence reports remain in the County archives, one from 1990 and one from 2010. Both concluded that the Mammoth Lakes Mosquito Abatement District ought to be dissolved.

The 1990 Sphere of Influence report for the MLMAD states:

The Mammoth Lakes Mosquito Abatement District should dissolve and transfer its service responsibilities to the Town of Mammoth Lakes. This recommendation complies with local LAFCO policies which state that "Special districts within a city's Sphere of Influence should plan for the ultimate transfer of service responsibilities to the City" as well as "in an incorporated area, the City, as opposed to special districts,

should be the provider of urban services because of its substantially broader revenue base and responsibility to provide services and controls to citizens within its boundaries.”

A 1990 staff report accompanying this report is even more blunt:

“A zero sphere of influence has been designated for the Mammoth Lakes Mosquito Abatement District. A zero sphere of influence indicates that the agency should dissolve. The zero sphere designation recognizes that the services provided by a small district, with no facilities and only one part-time employee, could be provided more economically and efficiently by the Town. The Town would also be able to provide mosquito abatement services to all areas of the community that need those services.”

The 2009 MSR for the Mosquito abatement district concluded that,

“At some point in the future, the mosquito abatement activities currently provided by the district might best be provided under the authority of the Town of Mammoth Lakes. At that time, the feasibility of such a reorganization should be determined by a reorganization committee...”

Both recommendations were made before the MLMAD chose to disband all local facilities and contract for abatement services.

For at least thirty years, LAFCO has consistently recommended dissolving the district. The change in operations provides an opportunity to change the service structure.

Section 56001 of the California Government Code states that:

“The Legislature finds and declares that a single multipurpose governmental agency is accountable for community service needs and financial resources and, therefore, may be the best mechanism for establishing community service priorities especially in urban areas. Nonetheless, the Legislature recognizes the critical role of many limited purpose agencies, especially in rural communities. The Legislature also finds that, whether governmental services are proposed to be provided by a single-purpose agency, several agencies, or a multipurpose agency, responsibility should be given to the agency or agencies that can best provide government services.”

The mosquito abatement activities currently provided by the district might best be provided under the authority of the Town of Mammoth Lakes, or another entity with mosquito abatement within its remit. The feasibility of such a reorganization should be determined by a reorganization committee consisting of representatives of the district, the Town, and Mono LAFCO. Any reorganization of the Mammoth Lakes Mosquito Abatement District and the Town of Mammoth Lakes should occur only with the concurrence of the Board of Directors of the District and the Mammoth Lakes Town Council.

III. INTRODUCTION

3.1 MUNICIPAL SERVICE REVIEWS

The Cortese-Knox-Hertzberg (CKH) Local Government Reorganization Act of 2000 requires Local Agency Formation Commissions (LAFCOs) to conduct comprehensive reviews of all municipal services in each county—or other appropriate area designated by the commission—in California and to periodically update that information.

Municipal Service Reviews (MSRs) are conducted by the commission documenting and analyzing the services in a particular geographic region or jurisdictional area pursuant to the requirements of Section 56430. The purpose of the MSR is to gather detailed information on public service capacities and issues to prepare written determinations pursuant to Section 56430 of the CKH.

The formation of local agency boundaries fits into the state’s larger goal of encouraging orderly growth and development. Section 56001 of the CKH recognizes that:

“the logical formation and determination of local agency boundaries is an important factor in promoting orderly development and in balancing that development with sometimes competing state interests of discouraging urban sprawl, preserving open-space and prime agricultural lands, and efficiently extending government services.”

3.2 COMBINED MUNICIPAL SERVICE REVIEW AND SPHERES OF INFLUENCE UPDATE

The CKH requires LAFCOs to develop and determine the Sphere of Influence (SOI) for each applicable local governmental agency that provides services or facilities related to development. CaLAFCO defines a SOI as:

“a planning boundary outside of an agency’s legal boundary (such as the city limit line) that designates the agency’s probable future boundary and service area. Factors considered in a sphere of influence review focus on the current and future land use, the current and future need and capacity for service, and any relevant communities of interest. With the passage of the CKH Act, spheres for all cities and special districts are reviewed every five years.

“The purpose of the sphere of influence is to ensure the provision of efficient services while discouraging urban sprawl and the premature conversion of agricultural and open space lands by preventing overlapping jurisdictions and duplication of services. Commissions cannot tell agencies what their planning goals should be. Rather, on a regional level, LAFCOs coordinate the orderly development of a community through reconciling differences between agency plans so that the most efficient urban service arrangements are created for the benefit of area residents and property owners.”ⁱⁱ

The information and determinations contained in a Municipal Service Review are intended to guide and inform SOI decisions. Service reviews enable LAFCO to determine SOI boundaries and to establish the most efficient service provider for areas needing new service. They also function as the basis for other government reorganizations. Section 56430, as noted above, states that LAFCO can conduct these reviews “before, in conjunction with, but no later than the time it is considering an action to establish a SOI.”

Spheres of influence must be reviewed and updated every five years (§56425). LAFCO can conduct MSRs before, or in conjunction with, but no later than the time it is considering an action to establish or update an SOI (§56430).

The Mosquito Abatement District’s Municipal Service Review is being conducted in conjunction with a review and update of the district’s SOI.

3.3 REVISED REQUIREMENTS

California Senate Bill 244, passed in 2011 and in effect since 2012, significantly revised the requirements for MSRs. Since the previous MSR for the Mosquito Abatement District dates to 2009, this is the first review written to the new requirements.

The 2003 Local Agency Formation Commission Municipal Service Review Guidelines detailed nine determinations necessary to an MSR, each consisting of between five and forty-nine elements.ⁱⁱⁱ These requirements have been streamlined. The new requirements, pared down to a list of seven, still review land use, demographics, present and future service needs as compared with capacity, and the financial ability of agencies to provide services. They additionally require agencies to give special consideration to Communities of Interest and Disadvantaged Unincorporated Communities (DUCs) during the review.

3.4 HEALTH AND SAFETY CODE

California’s Mosquito Abatement and Vector Control Law, contained in §2000-2093 of the Health and Safety Code, recognized that “adequate protection of human health against vectorborne diseases is best achieved by organized public programs”^{iv} and created a “broad statutory authority for a class of special districts with the power to conduct effective programs for the surveillance, prevention, abatement, and control of mosquitoes and other vectors.”^v

The Mammoth Mosquito Abatement District is one such special district.

§2007(b) of the Mosquito Abatement and Vector Control Law states that the CKH “shall govern any change of organization or reorganization of a district” but that “in the case of any conflict between that division and this chapter, the provisions of this chapter shall prevail.”

3.5 PROJECT AREA

The Mammoth Lakes Mosquito Abatement District (MLMAD) was formed in 1969 to provide mosquito control to a portion of Mammoth Lakes.

A Sphere of Influence indicates an agency’s probable future boundary and service area, as distinct from its current legal boundaries.^{vi} The MLMAD’s Sphere of Influence is much larger than its district boundaries, being coterminous with the municipal boundaries of the Town of Mammoth Lakes.

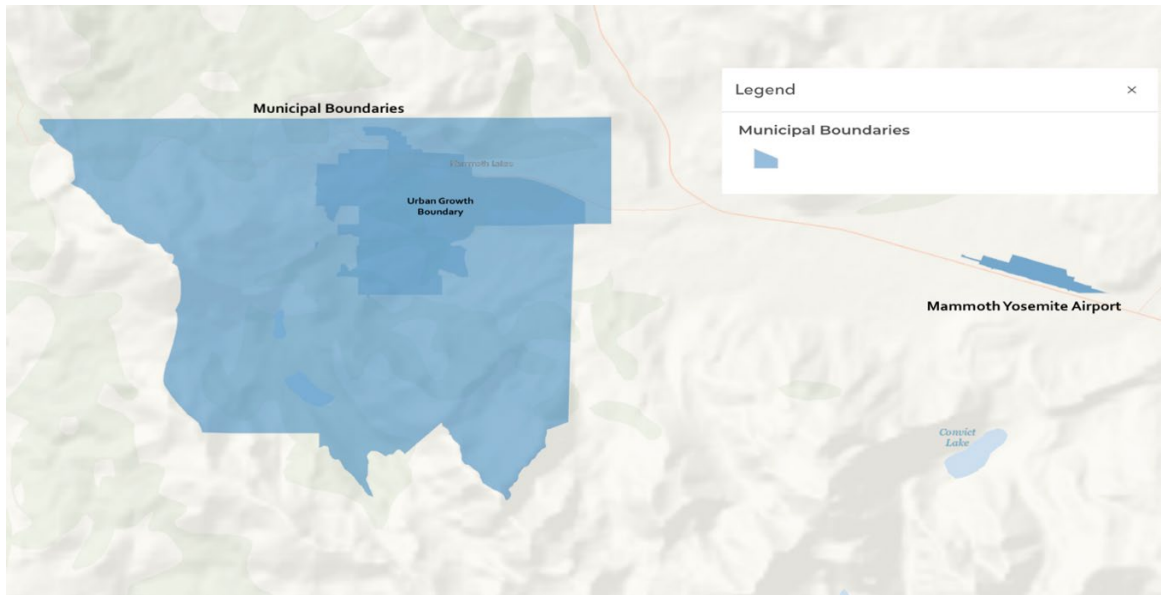


Figure 1: Town of Mammoth Lakes municipal boundaries, including the airport property.^{vii}

The legal description of the district boundary established in 1969 reads:

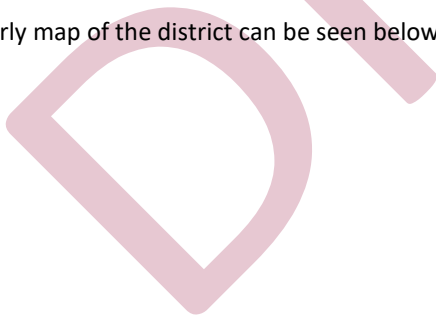
Those parcels of land lying within Sections 3 and 4, T. 4 S., R. 27 E., M.D.b. & M., County of Mono, State of California, and more particularly described as follows:

The West $\frac{1}{2}$ and Northwest $\frac{1}{4}$ of the Southeast $\frac{1}{4}$ of Section 3; That portion of the Northeast $\frac{1}{4}$ of the Southeast $\frac{1}{4}$ of Section 4 lying Southerly of Old Mammoth Drive.

EXCEPTING THEREFROM that parcel of land known as Pine Cliff Subdivision Recorded in Book 3 Pages 56 and 57 Records of County of Mono and More particularly described as follows:

Commencing at the intersection of Old Mammoth Drive and Woodman Street; thence S. $0^{\circ} 52'$ E. 316.39 ft. to the true point of beginning; thence S. $89^{\circ} 09'$ W. 455.00 ft.; thence S. $0^{\circ} 52'$ E. 505.00 ft.; thence M/ $89^{\circ} 08'$ E. 455.00 ft.; thence N $0^{\circ} 52'$ W 505.00 ft to the true point of beginning.

An early map of the district can be seen below:



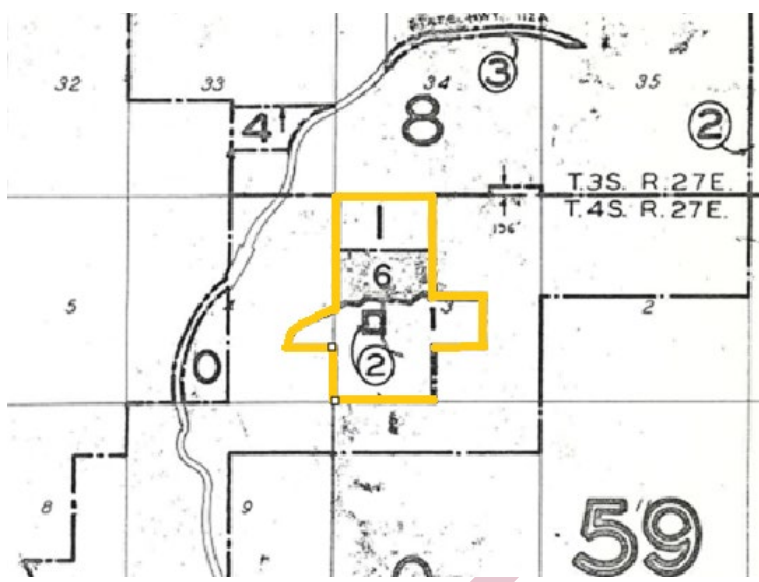


Figure 2: MLMAD highlighted in yellow, circa 1975

The boundaries described above, and shown in the map, match precisely the area from which the MLMAD presently receives tax revenues:



Figure 3: MLMAD Tax Zones

Starting in 1989, maps of the district encompass a larger area, as seen below:

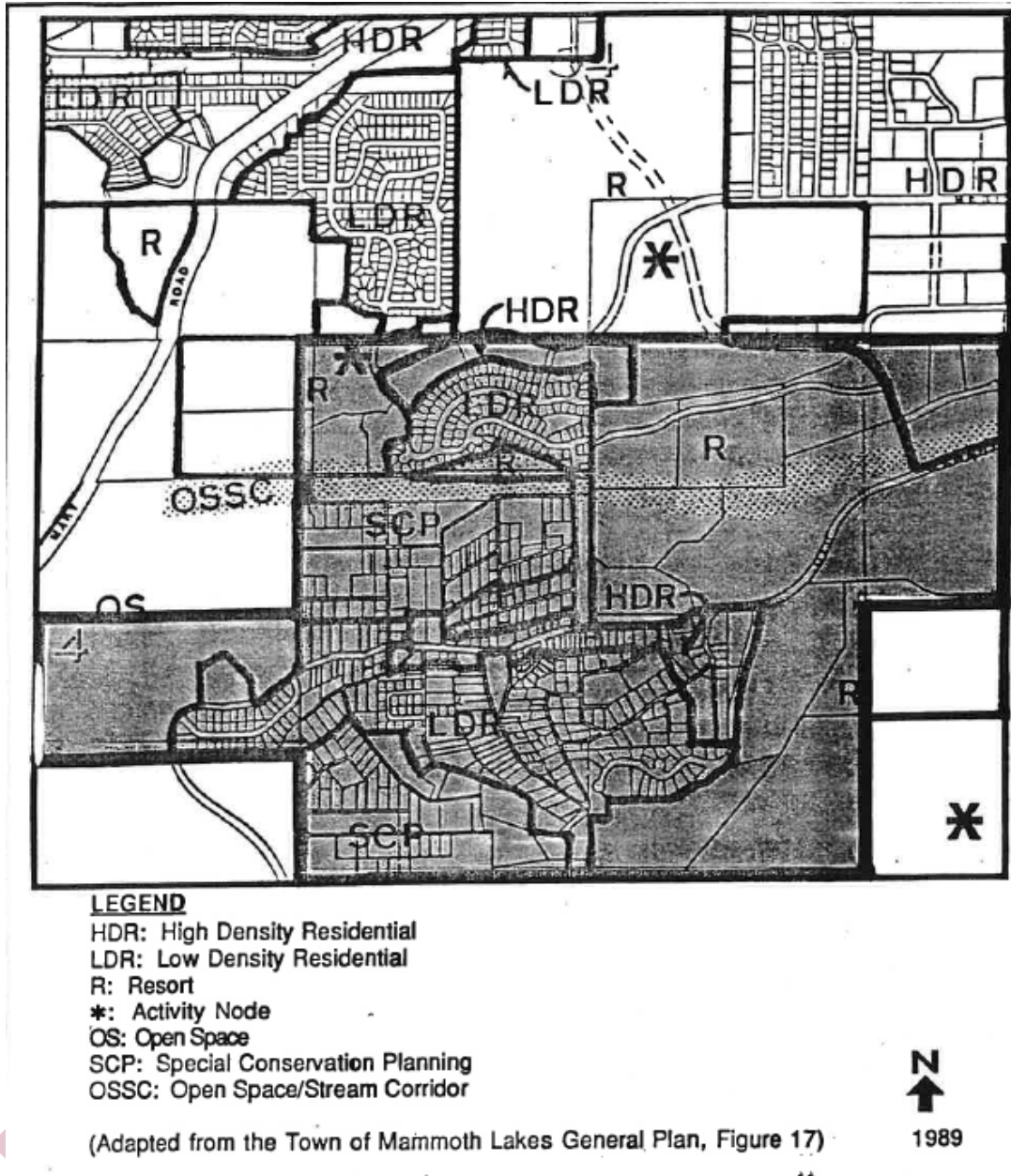


Figure 4: 1989 District Map

Subsequent reviews of the district, including the previous MSR prepared in 2010, include the enlarged map. However, a search of both paper and online archives produced none of the documentation—such as a CEQA review, a staff report, or a LAFCO resolution—that would have been generated by an annexation.

Although absence of evidence is not evidence of absence, given that the tax areas providing revenue to the district remain unchanged since 1969, it is prudent to assume that the original boundaries of the district were never formally expanded.

That being the case, in future the MLMAD should provide abatement services only within the confirmed boundaries of the district or propose an annexation.

IV. SERVICE REVIEW

In order to prepare and to update SOIs in accordance with California Senate Bill 244 §56425, §56430(a) requires the commission to conduct a service review of the municipal services provided in the county or other appropriate area designated by the commission. The commission shall include in the area designated for service review the county, the region, the subregion, or any other geographic area as is appropriate for an analysis of the service or services to be reviewed, and shall prepare a written statement of its determinations with respect to each of the following:

- 4.1 **Growth and population projections** for the affected area.
- 4.2 Location & characteristics of any **disadvantaged unincorporated communities** in or contiguous to the sphere of influence.
- 4.3 Present and planned **capacity of public facilities, adequacy of public services, and infrastructure** needs or deficiencies including needs or deficiencies related to sewers, municipal and industrial water, and structural fire protection in any disadvantaged, unincorporated communities within or contiguous to the sphere of influence.
- 4.4 **Financial ability of agencies** to provide services.
- 4.5 Status of, and **opportunities for, shared facilities.**
- 4.6 Accountability for **community service needs, including governmental structure and operational efficiencies.**
- 4.7 **Any other matter** related to effective or efficient service delivery, as required by commission policy.

These seven factors are listed below and analyzed in the discussions that follow.

4.1 GROWTH AND POPULATION PROJECTIONS FOR THE AFFECTED AREA.

Although the MLMAD does not provide services that directly affect population growth, population growth does affect mosquito populations. Urbanization changes the species composition in an area, favoring mosquitoes that live near and feed on humans, such as *Aedes aegypti*—a vector of several serious communicable diseases—while causing other species to decline.^{viii}

The 2020 US Census counted 7,191 permanent residents in the Town of Mammoth Lakes, down from 8,234 as recorded in the 2010 Census.^{ix} This marks a decrease of 1,043 residents or 12.7%.

The California Department of Finance (DOF) also publishes yearly demographic data which, like the ACS, is anchored to the most recent decennial census. A 2022 press release nevertheless warns against making direct comparisons between the two surveys,¹ even during the same year, as they “refer to different points of time” and significant events (such as a major fire, or a global pandemic) can cause measurable changes. With this caution, the Department of Finance’s E-5 Population and Housing Estimate published in May of 2025 registers an additional 2.4% decline, with

¹ “Comparing Census Bureau’s recently released July 1, 2021 estimates with Finance’s January 1, 2022 estimates should generally be avoided since they refer to different points in time. In addition, there are numerous differences between the two series including the effects of the wildfires, changes in migration patterns, accelerating slowdown in births, and excess deaths due to the COVID-19 pandemic that make comparisons difficult.” https://dof.ca.gov/wp-content/uploads/sites/352/Forecasting/Demographics/Documents/E-1_2022PressRelease.pdf

the 2020 estimate of 7,213 dropping to 7,040 in 2025.^x Their long-term projections, should the population of the Town hold steady at 55% of the County total,^{xi} forecast a population of 6,912 in 2030, of 6,553 in 2040 and 5,331 in 2060.²

The 2025 E-5 Population and Housing Estimate divided the 9,549 total housing units in the town into 3,017 occupied and 6,532 vacant units.^{xii} As a destination resort, the Town of Mammoth Lakes experiences high visitor populations. According to the September 2019 update to the General Plan the vacancy rate fluctuates between a year-round vacancy rate of 72% to a seasonal vacancy rate of 10%.^{xiii} Assuming the seasonal vacancy rate the maximum population in town at buildout would be 48,582.^{xiv}

According to the Housing Element, updated in 2019 and using data from 2016, 39.6% of housing units are owner-occupied and 60.4% of housing units are renter-occupied.^{xv} The average occupied household size is 2.28 persons per household.^{xvi}

4.2 THE LOCATION AND CHARACTERISTICS OF ANY DISADVANTAGED UNINCORPORATED COMMUNITIES WITHIN OR CONTIGUOUS TO THE SPHERE OF INFLUENCE.

Senate Bill 244, passed in 2011, requires LAFCO to make determinations regarding DUCs. Disadvantaged Unincorporated Communities are defined in the bill as “a fringe, island, or legacy community in which the median household income is 80 percent or less than the statewide median household income.”^{xvii}

California’s statewide median household income was \$95,521 in 2023.^{xviii} The threshold for a DUC would therefore be a household earning less than \$76,417. The median household income in the Town of Mammoth Lakes was \$87,121 in 2023.^{xix}

The 2021 Community Indicators Report uses subsidized school lunch eligibility as a proxy for measuring household income in Mammoth Lakes.^{xx} That report measured the 10-year district-wide average for the Mammoth Unified School District at 55% eligibility for subsidized school lunch. Participation in the federally subsidized school lunch program requires children to come from families with incomes at or below 130% of the federal poverty level. As the federal poverty level for a household of three was \$23,030 in 2022,^{xxi} at least 55% of all families with school-aged children in the Town of Mammoth Lakes would fit the category.

However, the Town of Mammoth Lakes is geographically compact. Though the Town’s total area spans 25 square miles,^{xxii} its Urban Growth Boundary restricts development to an area of only 4.5 square miles.^{xxiii} As a result, municipal services provided by the Town are distributed evenly to every neighborhood and no island, fringe, or legacy communities are excluded or underserved.

CaLAFCO publishes a statewide map of DUCs in California using data from ArcGIS, a mapping and spatial analytics software. No part of the Town of Mammoth Lakes, nor any area contiguous to it, is designated as a DUC.^{xxiv}

² Projections: California Department of Finance. Demographic Research Unit. 2025. State And County Population Projections 2020-2070 [computer file]. Sacramento: California Department of Finance. September 2025. Using DoF population estimates to measure the population of Mammoth Lakes as 55% of the population of Mono County: State of California, Department of Finance, E-1 Population Estimates for Cities, Counties and the State with Annual Percent Change — January 1, 2024 and 2025. Sacramento, California, May 2025. Accessed February 2026.

Similarly, Senate Bill 535 required the California Environmental Protection Agency (CalEPA) to identify disadvantaged communities within the state.^{3 xxv} CalEPA designates the highest scoring 25% of census tracts from CalEnviroScreen 4.0 as disadvantaged. By this measure, neither the Town of Mammoth Lakes nor any contiguous area is disadvantaged.

4.3 PRESENT AND PLANNED CAPACITY OF PUBLIC FACILITIES, ADEQUACY OF PUBLIC SERVICES, AND INFRASTRUCTURE NEEDS OR DEFICIENCIES INCLUDING NEEDS OR DEFICIENCIES RELATED TO SEWERS, MUNICIPAL AND INDUSTRIAL WATER, AND STRUCTURAL FIRE PROTECTION IN ANY DISADVANTAGED, UNINCORPORATED COMMUNITIES WITHIN OR CONTIGUOUS TO THE SPHERE OF INFLUENCE.

4.3.1 SERVICES PROVIDED

The Mammoth Lakes Mosquito Abatement District (MLMAD) was formed in 1969 to suppress mosquito populations in Old Mammoth.

Until 2013, MLMAD maintained its own facilities, including an office, lab, storage space, several trucks and specialized equipment such as foggers and propane traps. Staff included a single year-round employee, the District Manager, and several seasonal employees during mosquito season.

Starting in 2013, the MLMAD disbanded all local facilities in favor of a contract with the Owens Valley Mosquito Abatement Program (OVMAP). The MLMAD renewed the initial five-year contract in 2018 and again in 2024.

The 2013 contract between MLMAD and the OVMAP shows district boundaries that have expanded beyond any actual or presumed official district map:

³ Text of Senate Bill 535, re: identifying disadvantaged communities: “These communities shall be identified based on geographic, socioeconomic, public health, and environmental hazard criteria, and may include, but are not limited to, either of the following: (a) Areas disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation. (b) Areas with concentrations of people that are of low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, or low levels of educational attainment.”

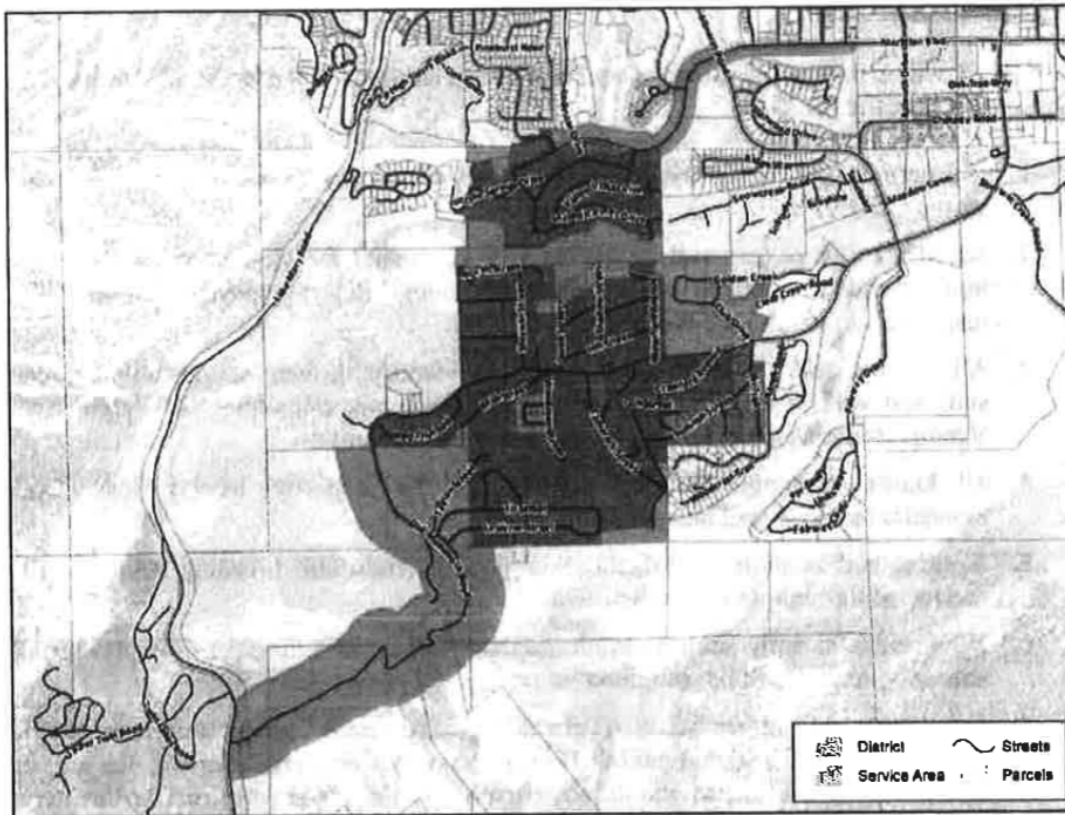


Figure 5: Boundaries shown in 2013 OVMAP contract

4.3.2 OPERATIONS

Mosquitoes are active in warm weather, so in mountainous areas of California mosquito season can stretch from April to November. Breeding season, and abatement efforts, begin in spring. Equipment maintenance and ongoing education occupy cooler months.

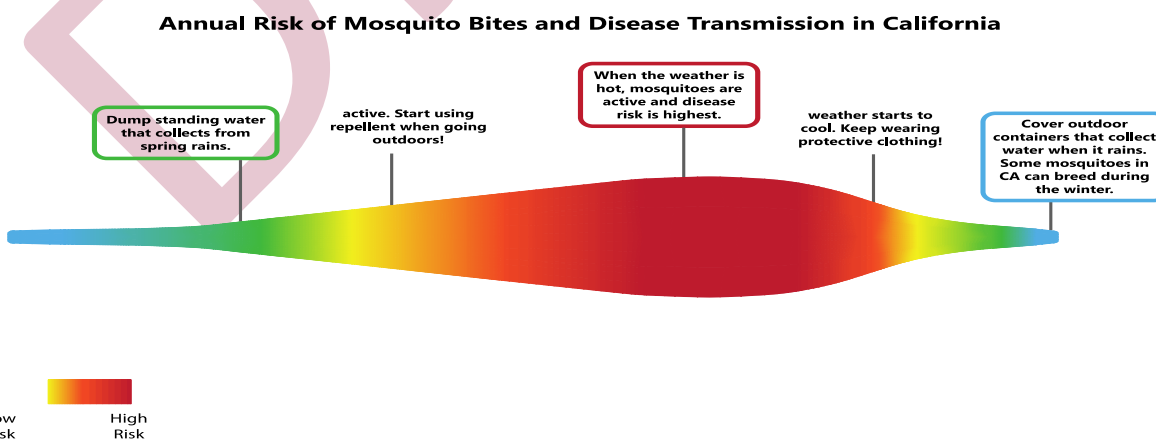


Figure 6: CDPH Mosquito Heat Map, Displaying Seasonal Mosquito Risk in California^{xvii}

MEASURE POPULATIONS

The OVMAP measures both immature and adult populations of mosquitoes within their service areas.^{xxxvii}

Immature mosquitoes (larvae and pupae) are collected from water sources where mosquitoes lay their eggs using a technique known as “dipping.”^{xxxviii} A long-handled ladle (“dipper”) is used to collect water samples and estimate the number of immature mosquitoes per “dip.” Technicians search for new sources and inspect known habitats for mosquitoes on a 7 to 14-day cycle. The data is used to direct control operations and estimate the expected size of future adult populations.^{xxxix}

A variety of adult mosquito traps are used to measure adult populations. The CO₂/EVS trap is the most effective and popular.^{xxx} These traps use dry ice (CO₂) as a bait to attract female mosquitoes looking for a blood meal. Mammals exhale high concentrations of CO₂, which mosquitoes sense when seeking a blood meal. Because dry ice evaporates into CO₂, it draws mosquitoes close enough for fans to propel them into nets.^{xxxi}

The majority of mosquito-borne illness is spread by mosquitoes that have evolved to specialize in biting humans, and mosquitoes can identify hosts by odor.^{xxxii} For this reason, OVMAP deploys a BG Sentinel trap in Mammoth throughout the mosquito season that is configured to emit an artificial human scent.^{xxxiii} The BG Sentinel also mimics human convection currents (body heat), and can be used with or without CO₂.^{xxxiv} BG Sentinel traps monitor for invasive species, especially the *Aedes aegypti* and the *Aedes albopictus*, disease carriers which display a strong preference for human odors.^{xxxv} None have yet been discovered within the MLMAD area.^{xxxvi}

SUPPRESS POPULATIONS

The OVMAP tackles mosquito abatement in three stages.

The first stage is to manage water so that it does not stand long enough to support mosquito growth. This isn’t always possible, especially on privately held property. Mosquitoes can breed in buckets and rain barrels, in fountains, gutters and downspouts, in non-chlorinated swimming pools and in pool covers that collect water, and in tires and in tree holes.^{xxxvii}

The second stage—and the primary focus of the OVMAP’s efforts—is to apply larvicides to mosquito breeding grounds before the mosquitoes grow wings. Larvicides kill mosquito larvae and pupae before they grow into biting adults. Effective larvicide requires deep knowledge of the terrain and of mosquito development.

When used properly, larvicides do not harm people, pets, or the environment.^{xxxviii} Larvicides are appropriate in standing water that won’t be used for drinking, and cannot be covered, dumped, or removed.^{xxxix} The OVMAP Facebook page features many videos of local ponds teeming with mosquito larvae,^{xl} generally taken immediately in advance of a larvicide treatment.

The third stage is to spray adulticides with a fogger, targeting mosquitoes that have grown wings. Adulticides are best used where mosquitoes rest: under plants, in dense brush or tall grasses, and on the undersides of leaves. They can also rest under the eaves of buildings, under decks and porches, and in moist, shady areas.^{xli}

4.3.3 SERVICE DEFICIENCIES

Several factors can compromise abatement efforts.

One is that mosquitoes travel. They can travel from neighborhoods that do not engage in mosquito abatement, and members of the MLMAD Board of Trustees regularly float the idea of expanding the MLMAD district boundaries for this reason. Mosquitoes can also travel from inaccessible wilderness areas, which are abundant in Mono County. Robert Miller of the OVMAP notes that during rainy years, adults breed in inaccessible snowmelt and travel toward human populations.

Another is that mosquitoes can breed on private property. Although the Health and Safety Code specifies that it is the responsibility of private property owners to control vectors on their property, and that special districts can penalize property owners who fail to do so,⁴ it may not be practical or desirable to punish homeowners for allowing water to pool in buckets, gutters, and tree hollows.

4.3.4 FACILITIES AND EQUIPMENT

Facilities and equipment are addressed under “Shared Facilities,” as they belong to the OVMAP. Equipment and facilities previously owned or leased by the MLMAD (an office, lab, storage space, several trucks and specialized equipment) were retired when MLMAD entered into the contract service agreement.

4.3.5 ADMINISTRATION AND STAFFING

As required by HSC §2020, a five-member Board of Trustees governs the MLMAD. The Board is appointed by the County Board of Supervisors and meets as needed, usually twice a year. Board members are not compensated for meetings.

Maintaining a quorum is difficult—though the district’s administrator Lorinda Beatty notes that, “this is not an uncommon factor for many boards in this area.”^{xlii}

The MLMAD has no staff but does contract for administrative services and yearly audits.

4.4 FINANCIAL ABILITY OF AGENCIES TO PROVIDE SERVICES

The district is funded by property taxes. Figure 6 identifies the tax zones that provide revenue for the district.

⁴ Health and Safety Code §2060-2063, for example 2061(b)(5): “Inform the owner of the property that the failure to comply with the requirements of the notice within the specified times may result in the imposition of civil penalties of up to one thousand dollars (\$1,000) per day for each day that the public nuisance continues after the specified times.”

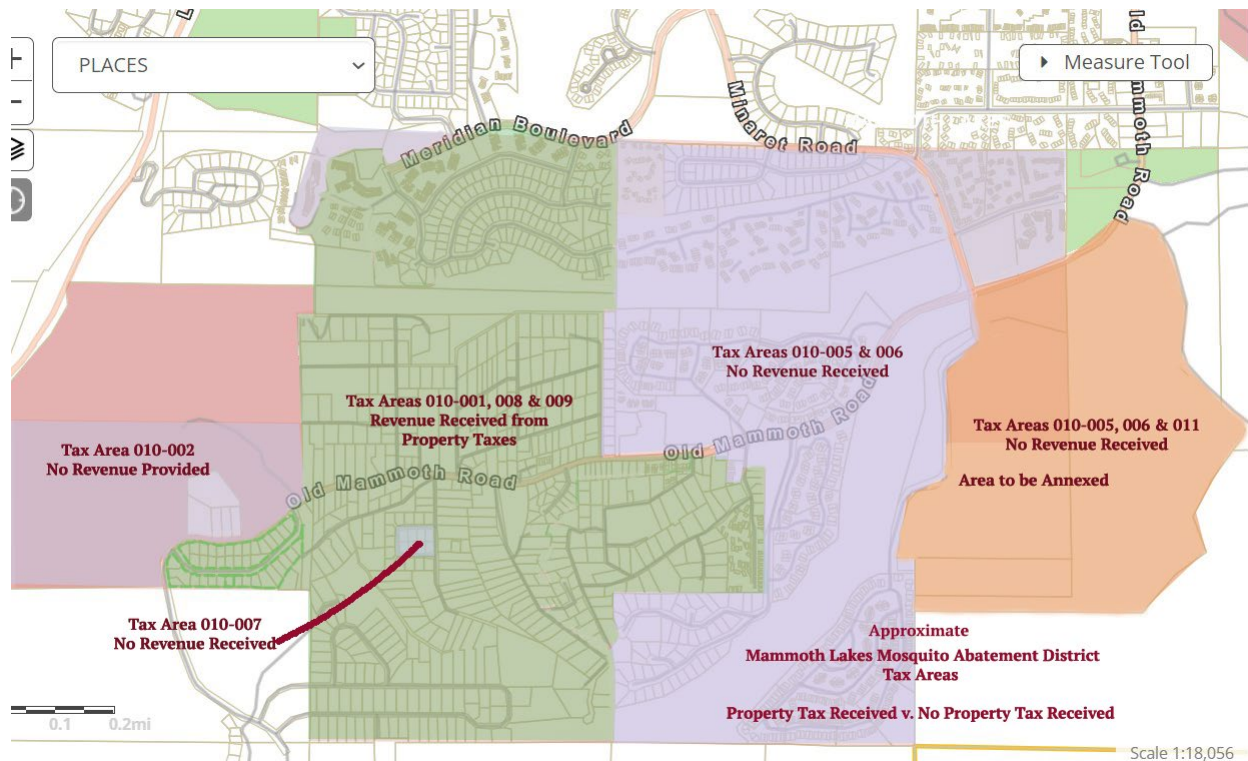


Figure 7: MLMAD Tax Zones

As of the previous MSR in 2009, when the MLMAD maintained its own abatement services, revenues amounted to \$108,480, of which \$88,273 or 81% came from property taxes. Expenses included salaries, stipends, benefits, service and supplies, as well as insurance, totaling \$116,357.

During Fiscal Year 2024-2025, revenues totaled \$145,615.81 while expenses amounted to \$122,199.36, a net positive of \$23,416.45. Property taxes generated \$127,334.53, 87% of the total.

The reserve account, as of June 30, 2025, had an available balance of \$290,243.05. The MLMAD's reliance on contract services necessitates a substantial emergency reserve fund. Should the contract not be renewed, the MLMAD must be able to quickly assemble personnel, equipment, and facilities.^{xliii} MLMAD does not have a formal estimate of cost to resume activities inside the existing service area boundary.

Switching from a local operation to a contract with OVMAP has resulted in significant cost savings, reversed a trend where yearly expenses exceeded revenues, and allowed the district to build substantial reserves.

The contract with OVMAP cost the MLMAD \$70,000.00 in FY24-25. Additional expenses, including liability insurance, administrative and secretarial fees, office expenses, and an audit, amounted to \$53,500. Covering additional area, as in the case of an annexation to the district boundary, will increase costs, demand additional revenues, and require renegotiating the contract with OVMAP.

Starting in FY 2024-2025, the Town of Mammoth Lakes has proposed an additional \$30,000 of annual funding for the district, which will increase by increments of \$5,000 per year for five years. The Town has not responded to inquiries about the intended use of these supplementary funds.

2024-2025 BUDGET ^{xlv}				
REVENUES			EXPENDITURES	
REVENUE	BUDGET		EXPENDITURE	BUDGET
<i>Property Tax</i>			Administrative Fee	3,500
Secure	110,000		Contract – Owens Valley MAP	70,000
Unsecure	6,500		Liability Insurance	3,500
Unitary	2,000		Secretarial	10,000
<i>Total Property Tax</i>	<i>\$118,500.00</i>		Auditor Fee	1,500
<i>Other Income</i>			Office expenses/Equipment	250
Excess ERAF Distribution	0		PERS Unfunded Liability	7,100
Interest	5,000		Membership Dues	1,000
Prior Year Net Income	0		Contingency	12,650
<i>Total Other</i>	<i>\$5,000</i>		Reserves	-2,000
			Emergency/Unexpected	
			Legal fees – Annexation	12,000
Total Revenue	\$123,500.00		Total Expenditures	\$123,500.00

Table 1. MLMAD 2024-2025 Budget

4.5 STATUS OF, AND OPPORTUNITIES FOR, SHARED FACILITIES

As discussed above, the MLMAD has contracted with the Owens Valley Mosquito Abatement Program for services since 2013.

While mosquito abatement efforts in the Owens Valley began in the early 1950s, the OVMAP wasn't formalized until 1983. Benefit assessments in 1998 and 2005 stabilized funding to support two full-time and three seasonal mosquito control technicians.

The OVMAP maintains a fleet of five larvicide trucks, three fogging trucks, one trapping truck and a variety of off-roading vehicles such as ATVs, a side-by-side, and an amphibious Argo machine. Additional equipment includes dust blowers, handheld foggers, and a variety of traps.^{xlv}

The OVMAP is housed in the Inyo agricultural maintenance building at 218 Wye Road in Bishop, and provides mosquito abatement across a broad area, mostly in Inyo County. Their abatement coverage reaches Olancho in the south and the MLMAD in the north, as displayed in Figure 7.

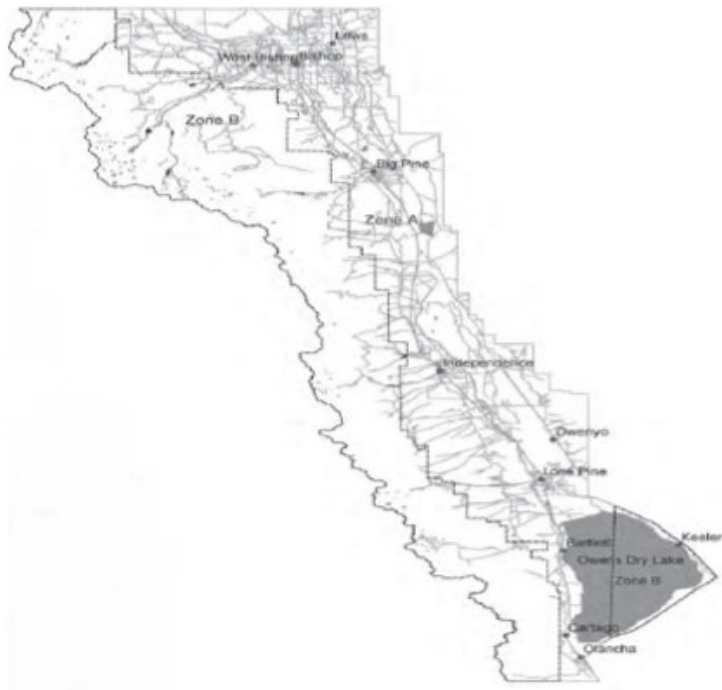


Figure 8: OVMAP Service Area

4.6 ACCOUNTABILITY FOR COMMUNITY SERVICE NEEDS, INCLUDING GOVERNMENTAL STRUCTURE AND OPERATIONAL EFFICIENCIES.

The MLMAD has a five-member Board of Trustees, as required by the Health and Safety Code. Trustees are appointed by the County. The MLMAD maintains a page on the Mono County website (<https://monocounty.ca.gov/mlmad>), with contact information. The most recent budget includes a financial audit.

The Owens Valley MAP maintains a page on the Inyo County website (<https://www.inyocounty.us/services/agriculture/mosquito-abatement>) as well as an active Facebook page (<https://www.facebook.com/OVMAP>) where staff regularly post photos and videos of their abatement activities, along with educational materials and relevant news and updates. Posts are open to comment and staff respond promptly.

4.7 ANY OTHER MATTER RELATED TO EFFECTIVE OR EFFICIENT SERVICE DELIVERY, AS REQUIRED BY COMMISSION POLICY

4.7.1 PROPOSED ANNEXATION

Annexation requirements related to the Snowcreek VIII development project are unclear and new information regarding direct funding of the district by the Town of Mammoth Lakes require further investigation.

A map of the proposed annexation area is included below. The development will increase density and population, introduce new water features and landscaping, and heighten the mosquito risk in the area.^{xiv} MLMAD does not yet

know what impact the proposed annexation will have on the district,^{xlvi} but any expansion would have to occur in tandem with increased tax revenues.^{xlvii}

Part of Snowcreek VII is already treated by the district. The annexation, if completed, would add 130 acres to the 340 acres currently being treated, an increase of 38%.

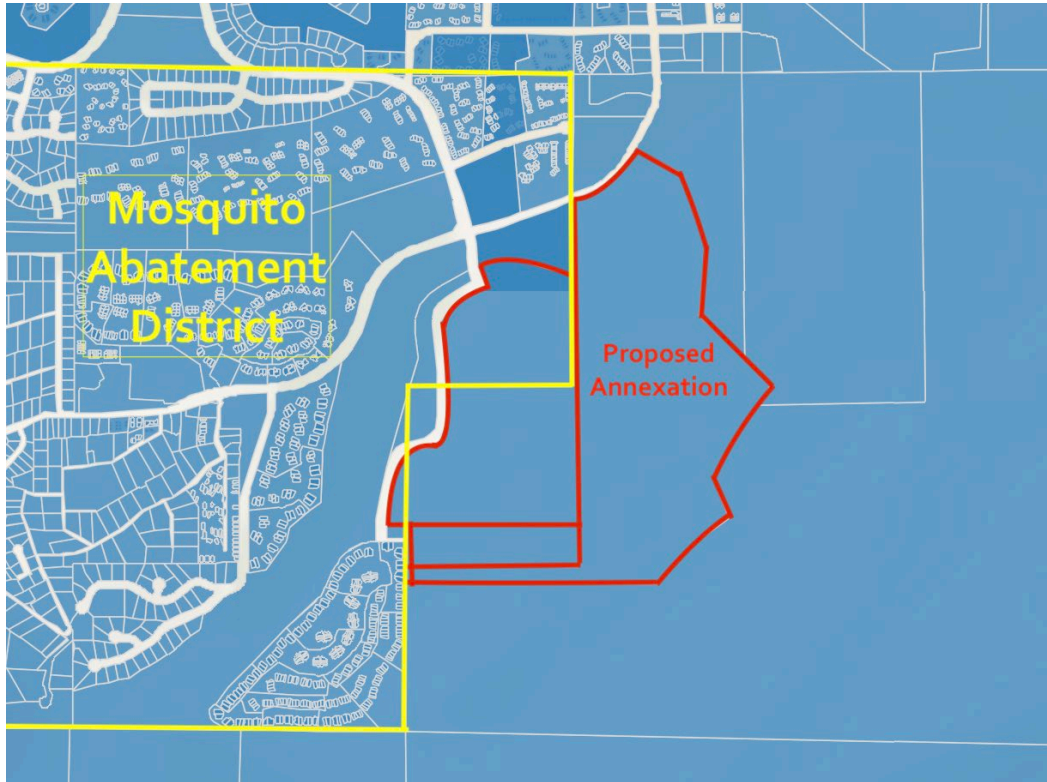


Figure 9: MLMAD Proposed Annexation Area^{xlviii}



Figure 10: Expanded view marking the area displayed in Figure 9, for reference.

A prudent revision of the MLMAD's district boundaries, as discussed in section 3.5, places obstacles in the path of any proposed annexation. If the MLMAD's district boundaries are understood to remain as they were created in

1969, then no part of the proposed annexation area is contiguous with the expanded boundaries proposed in the annexation.

V. SPHERE OF INFLUENCE

California Senate Bill 244 §56425(e) requires the commission to consider and prepare a written statement of its determinations with respect to the following five factors:

- 5.1 The **present and planned land uses** in the area, including agricultural and open-space lands.
- 5.2 The present and probable **need for public facilities** and services in the area.
- 5.3 The **present capacity of public facilities** and adequacy of public services that the agency provides or is authorized to provide.
- 5.4 The **existence of any social or economic communities of interest in the area** if the commission determines that they are relevant to the agency.
- 5.5 For an update of a sphere of influence of a city or special district that provides public facilities or services related to sewers, municipal and industrial water, or structural fire protection, that occurs pursuant to subdivision (g) on or after July 1, 2012, **the present and probable need for those public facilities and services of any disadvantaged unincorporated communities** within the existing sphere of influence.

These five factors are listed below and analyzed in the discussions that follow.

5.1 THE PRESENT AND PLANNED LAND USES IN THE AREA, INCLUDING AGRICULTURAL AND OPEN-SPACE LANDS

The Mosquito Abatement District is wholly contained within the Town of Mammoth Lakes, an incorporated community in southwest Mono County, in the eastern Sierra Nevada mountains. Development within the Town is restricted to its 4.5 square mile Urban Growth Boundary,^{xix} of which slightly less than 4 square miles are privately owned. The remaining incorporated area is publicly owned and managed by the Inyo National Forest.

Mammoth Mountain Ski Area lies northwest of the developed portion of the Town, on private land within the municipal boundaries. The Lakes Basin, in the southwest portion of the incorporated area, is a recreation destination with cabins, lodges, and campgrounds. Farther south in Long Valley, Crowley Lake attracts both fishermen and water sports enthusiasts.

Beyond the Town's municipal boundary, the majority of the land surrounding Mammoth Lakes is publicly owned and managed by the United States Forest Service. The National Park Service manages Devil's Postpile National Monument to the west of the Town while the Bureau of Land Management (BLM) manages lands adjacent to Lake Crowley. The Los Angeles Department of Water and Power and BLM own and manage a significant amount of land to the east of Mammoth Lakes.

The eastern entrance to Yosemite National Park is 32 miles north.

5.2 THE PRESENT AND PROBABLE NEED FOR PUBLIC FACILITIES AND SERVICES IN THE AREA

The primary purpose of a mosquito abatement district is to suppress mosquito-borne diseases. Minimizing the nuisance of irritating mosquito bites is a (much-appreciated) bonus.

The Centers for Disease Control and Prevention—along with many other local, national, and global health organizations—recognize mosquitoes as “the world’s deadliest animal”^l because of their ability to transmit deadly diseases.

Mosquito populations are on the rise in California, increasing up to tenfold in certain regions,^{li} spurred in part by increases in population density.^{lii} Climate change is also a concern, as increasing temperatures will extend the mosquito season and shift the geographic ranges where specific species of mosquito thrive.

Mosquito-borne illnesses are a danger in California, and mosquitoes that carry them are regularly found in Mono County.

West Nile virus is the most common and serious vector-borne disease in California. Several species of the *Culex* mosquito can carry it,^{liii} including one that is commonly found by the Owens Valley Mosquito Abatement Program: *Culex tarsalis*. There have been more than 8,000 human cases of West Nile virus and nearly 400 deaths reported in California since 2003.^{liv} While there have been no positive human tests of West Nile in humans in Mono County, humans have tested positive for West Nile in the neighboring counties of Madera and Fresno.^{lv} Additionally, West Nile-positive pool samples are regularly collected in Inyo County.

St. Louis Encephalitis Virus (SLEV) is also carried by the *Culex* mosquito. Although fewer than ten human cases have been reported per year in California since 1990,^{lvi} those cases have been concentrated in the Central Valley.^{lvii} Most people infected with SLEV don’t show symptoms, but in rare cases it leads to inflammation of the brain (encephalitis) and death.^{lviii}

The invasive *Aedes aegypti* has been spotted in neighboring Madera and Fresno.^{lix} *Aedes aegypti* can transmit Zika, dengue, chikungunya and yellow fever.^{lx} Though *Aedes aegypti* has not yet been identified in Mono, several species of *Aedes* mosquito thrive in the County: *Aedes melanimon*, *Aedes nigromaculis*, *Aedes dorsalis*, and *Aedes increpitus*.

As of February 2026, nearly all cases of dengue in California have been associated with travel abroad, but the California Department of Public Health (CDPH) annually records over 200 cases in humans.^{lxi} A carrier mosquito becomes infected when it bites a person who has dengue virus and after a week, that mosquito’s bite can transmit the virus.^{lxii}

Similarly, as of March 2026 there have been no local mosquito-borne transmission of Zika virus in California.^{lxiii} But Zika can transfer from human-to-human, as well as through infected mosquito bites. The CDPH has recorded 756 infections in humans since 2015,^{lxiv} though numbers have steadily decreased since the 2015 and 2016 seasons.

Malaria is no longer common in the United States. While the mosquito that carries it—*Anopheles freeborni*—can be found in California, it is rare in OVMAP tests. Eastern Equine Encephalitis (EEE) is a rare but serious mosquito-borne illness; approximately 30% percent of all humans infected with EEE die and many survivors have ongoing neurologic problems.^{lxv} Transmission is most common in and around freshwater hardwood swamps in the Atlantic and Gulf Coast states, and the Great Lakes region. As of January 2025, no cases had been reported in California.^{lxvi}

5.3 THE PRESENT CAPACITY OF PUBLIC FACILITIES AND ADEQUACY OF PUBLIC SERVICES THAT THE AGENCY PROVIDES OR IS AUTHORIZED TO PROVIDE

The MLMAD, through OVMAP, has the facilities, staff, and equipment to suppress mosquito populations within the district boundaries.

As the goal of mosquito abatement is to suppress vector-borne diseases, the best measure of their adequacy is the rate at which such diseases occur. A dead bird tested positive for West Nile Virus in Mono County in 2010, but as of February 2026 no further incidents had been reported to the California Department of Public Health.⁵ No human cases of the most common and serious vector-borne diseases in California—West Nile Virus^{lxvii} and St. Louis Encephalitis (SLEV)^{lxviii}—have been recorded in Mono county.⁶

MLMAD Board Members are satisfied with the quality of service and report few complaints from residents.^{lxix}

5.4 THE EXISTENCE OF ANY SOCIAL OR ECONOMIC COMMUNITIES OF INTEREST IN THE AREA IF THE COMMISSION DETERMINES THAT THEY ARE RELEVANT TO THE AGENCY

The California Constitution, Article XXI, §2(d)(4) defines a community of interest as:

“a contiguous population which shares common social and economic interests that should be included within a single district for purposes of its effective and fair representation.

Examples of such shared interests are those common to an urban area, a rural area, an industrial area, or an agricultural area, and those common to areas in which the people share similar living standards, use the same transportation facilities, have similar work opportunities, or have access to the same media of communication relevant to the election process.^l

Communities of interest shall not include relationships with political parties, incumbents, or political candidates.^{lxx}

Proposition 11, passed in 2008, made maintaining Communities of Interest a key requirement for drawing political districts. Both the Citizens Redistricting Commission and the Legislature are required to take Communities of Interest into account when drawing the boundaries of Congressional, State Senate, State Assembly, and State Board of Equalization districts.^{lxxi}

The California Citizens Redistricting Commission is instructed to keep communities together whenever possible when drawing new districts. In order to learn about and identify such communities, the Commission encourages the public to draw and submit maps of their own communities in advance of each decennial redistricting.⁷

⁵ Consulted https://westnile.ca.gov/resources_reports?report_category_id=2, Positive Counts by City/County between 2010 and 2022. No infected birds were reported in Inyo during this time. The site also reports on WNV in horses. There were no cases of WNV in horses in Mono County between 2010 and 2017, but the site does not post records for 2018 or later. https://westnile.ca.gov/resources_reports?report_category_id=5

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⁷ For example, the California Citizens Redistricting Commission launched the Draw My California page: <https://drawmycalifornia.org/drawmycacomunity.html>

The 2011 Citizens Redistricting Advisory Committee Report to the Board of Supervisors grouped communities of interest within the County around watersheds, school districts, racial groups, proximity to medical and retail services, and economic concerns—specifically agriculture, tourism, skiing, fishing, recreation, and the service industry.^{lxxii}

5.5 FOR AN UPDATE OF A SPHERE OF INFLUENCE OF A CITY OR SPECIAL DISTRICT THAT PROVIDES PUBLIC FACILITIES OR SERVICES RELATED TO SEWERS, MUNICIPAL AND INDUSTRIAL WATER, OR STRUCTURAL FIRE PROTECTION, THAT OCCURS PURSUANT TO SUBDIVISION (G) ON OR AFTER JULY 1, 2012, THE PRESENT AND PROBABLE NEED FOR THOSE PUBLIC FACILITIES AND SERVICES OF ANY DISADVANTAGED UNINCORPORATED COMMUNITIES WITHIN THE EXISTING SPHERE OF INFLUENCE.

The Mosquito Abatement District does not provide sewer, municipal or industrial water, or structural fire protection.

ENDNOTES

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