NAPA COUNTY
MOSQUITO ABATEMENT DISTRICT
1984 BASELINE REPORT
SPHERE OF INFLUENCE
ESTABLISHMENT

NOVEMBER 28, 1984

NAPA COUNTY
LOCAL AGENCY FORMATION COMMISSION
NAPA COUNTY MOSQUITO ABATEMENT DISTRICT

1984 BASELINE REPORT

SPHERE OF INFLUENCE ESTABLISHMENT

Adopted

November 28, 1984

Napa County Local Agency Formation Commission
Armand J. Greco, Chairman
James H. Hickey, Executive Officer
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INTRODUCTION

The Knox-Nisbet Act of 1963 requires that Local Agency Formation Commissions (LAFCOS) adopt, periodically review, and update spheres of influence for each of the local agencies under their jurisdiction. A sphere of influence is a planning tool used by a LAFCO to identify an orderly future service area for the agency involved. It provides a guide when considering future service area changes. The ultimate purpose of a sphere of influence is to encourage the development of service area boundaries that promote economic and efficient service provision by the unit of local government under consideration.

A LAFCO applies a sphere of influence in much the same manner as a city or county applies its general plan. A city or county is required by law to find that a project is consistent with its adopted plan before it can be approved. Similarly, a LAFCO looks for consistency between a boundary revision request and the adopted sphere of influence for the particular agency involved.

As part of the sphere adoption process, a LAFCO may recommend that a unit of local government change its policies, operations, or fee structure. It may also recommend the expansion or reduction of an agency's jurisdictional boundary, or even its dissolution. However, a LAFCO does not have the power to compel compliance with any of its recommendations. An agency's right to provide, and a property owner's right to receive, service to a parcel within its boundaries is unaffected by either the sphere of influence adopted or the recommendations made.

In establishing a sphere of influence, the Knox-Nisbet Act requires that a LAFCO consider and prepare a written statement of its findings with respect to the eight factors listed below:
1. The maximum possible service area of the agency based upon its present and possible future service capabilities.

2. The range of services the agency is providing or could provide.

3. The projected future population growth of the area.

4. The type of development occurring or planned for the area including but not limited to residential, commercial, and industrial development.

5. The present and probable future service needs of the area.

6. Local governmental agencies presently providing services to the area and the present level, range and adequacy of these services.

7. The existence of social and economic interdependence and interaction between the area within the boundaries of a local governmental agency and surrounding areas which could be considered for inclusion within the agency's sphere of influence.

8. The existence of agricultural preserves which might in the future be included within an agency's sphere of influence and the effect of said inclusion on their physical and economic integrity.

This report provides the background information needed to make the required findings (see Appendix B for the specific findings recommended).

II DEFINITIONS

The area evaluated in this report, hereafter referred to as "the Study Area" includes all incorporated and unincorporated lands within Napa County. The planning period selected is 10 years.

The main acronyms used throughout this report are listed below:
III BACKGROUND

The Napa County Mosquito Abatement District, hereafter referred to as NCMAD, was established in 1925 to provide nuisance insect control throughout Napa County. The District currently contains 512,580 acres of land (see Figure 1). Since its formation there have been no changes in the District's boundaries. For more details regarding the District and the area it services, see Appendix A.

IV CRITERIA

Every sphere of influence boundary is defined by an implicit or explicit set of criteria. A sound sphere of influence is based on the government codes and policies under which a LAFCO works as well as an understanding of the operations of the agency in question. In the present instance, the suggested criteria would place within NCMAD's Sphere of Influence all incorporated and unincorporated lands that:

1. lie within the existing boundaries of the District, and

2. can be efficiently and economically provided mosquito abatement service by the District.

These criteria have been used in developing the sphere of influence proposed in this report.
V ANALYSIS

There are three basic considerations to be taken into account in determining an agency’s sphere of influence. The first is the area the agency can adequately serve. The second is the area policy and government code constraints will allow the agency to annex. The last is the area that is expected to need service during the planning period, in this case the next ten years. A secondary consideration is the area located within the agency’s boundaries.

The area that a mosquito abatement district can adequately serve is dependent on several factors. In NCMAD’s case, the most important are:

1. Travel times
2. Staff/equipment availability

The preceding two factors have been analyzed with regard to NCMAD (see Appendix A for detailed discussion). Based on this evaluation it has been determined that the District would be able to now and in the foreseeable future provide adequate mosquito abatement service throughout the entirety of the 512,580-acre Study Area.

The area within which LAPCOM can approve an agency to annex lands is based on a number of factors including:

1. Agricultural capability of the soil
2. Presence of agricultural preserves
3. Current and probable future land use
4. Zoning
5. General Plan designation

In the case of NCMAD, none of these factors pose any constraint on annexation. Thus, any area outside the District’s current boundaries would be annexable.

The area that is expected to need service in the foreseeable future includes the entirety of the Study Area (i.e., Napa County). Insect abatement is also needed in surrounding areas. However,
these lands lie in other mosquito abatement districts that provide this service.

The three considerations discussed above have been combined to define a 512,580-acre proposed sphere of influence for NCMAD (see Figure 2). The proposed sphere of influence is coterminous with the District's present boundary.

VI DISCUSSION

There are 7 facts regarding mosquito abatement in general, NCMAD's existing operations, and the District's financial position that warrant some additional consideration here.

1. Mosquito abatement is an important governmental service throughout the San Francisco Bay Region. Without effective mosquito control, many parts of the area, including the southern portions of Napa County, would contain large mosquito populations making such areas unhealthy places to either live or work.

2. Mosquito abatement can probably be most efficiently handled on a regional basis. Administrative, operational and financial considerations, however, suggest that consolidation of NCMAD with the Solano and/or Marin-Sonoma Mosquito Abatement Districts would actually hurt mosquito abatement efforts in Napa County. Local control would be lost, only small reductions in administrative and possibly office staff would be realized, and the $35,000 per year in augmentation funds spent by the District on mosquito abatement would be lost.

3. NCMAD currently provides mosquito abatement services via contract to the naval facilities located at Skaggs Island in Sonoma County. Normally provision of service by contract outside a district's boundaries is not encouraged. However, in the current instance this action appears reasonable, for control of the mosquito populations in this area substantially furthers the District's mosquito abatement efforts within its own boundaries.
4. Projections of substantial revenue shortfalls in 1995 have been made by the Consultant (see Appendix A "Financial Considerations"). However, District Manager Lou Risley has indicated that NCMAD's revenues will increase sufficiently to meet all necessary expenditure increases during the next decade. This statement is based on an expenditure growth rate for the District of 5%, rather than the 12% growth rate projected by the Consultant.

5. NCMAD has 3 to 4 years to increase its revenues or decrease its expenditures before the shortfalls projected by the Consultant in this report (see Page A-7) cause the level of service provided by the District become inadequate.

6. NCMAD may be able to increase its revenues in several ways. The District could seek to impose a small annual district-wide mosquito abatement tax. A tax of only $2.45 per household (1984-85 dollars) would be sufficient to offset the entire $120,000 1995 shortfall projected by the Consultant. Establishment of such a tax would require the approval of two-thirds of the voters in the District. Another way to increase revenues would be for the District to charge a yearly fee for servicing all new and existing public and private sewage disposal ponds. A fee of approximately $700/year/pond complex (1984-85 dollars) would have to be charged to completely recover NCMAD's costs. The District currently already charges public agencies (i.e., the Napa Sanitation District, City of Napa, City of St. Helena, City of Calistoga, and Napa County itself) for the mosquito abatement services it provides because of their facilities.

7. NCMAD may be able to realize long-term savings through utilization of other agencies' buying power, facilities, and personnel. Continued coordination of the purchase of fuel, pesticides and major pieces of equipment such as trucks with Napa County and/or other districts will save NCMAD money. Contracting with Napa County for the provision of telephone answering services would allow maintenance of a full-time district office at a fraction of the cost of hiring additional personnel. Even more money could be saved by consolidation of NCMAD's operations with those of either the Napa County Environmental Health Department (NCEHD) or the Napa County Agricultural Commissioner's Office (NCACO).

8. Annexation by NCMAD of any property located outside Napa County would cause the District to lose its ability to obtain district augmentation funds. On the other hand,
NCMAD would no longer have to contribute money to the Special District Augmentation Fund. Overall, NCMAD would lose about $25,000 per year. It is extremely unlikely that any benefits received from such an annexation would offset this large negative financial impact.

VII FINAL ACTION

The Napa County Local Agency Formation Commission adopted on November 28, 1984 the resolution contained in Appendix B which does the following:

1. Establishes criteria defining NCMAD's Sphere of Influence so as to relate this line to the ability of the District to efficiently provide mosquito abatement service;

2. Establishes a 512,580-acre sphere of influence for NCMAD;

3. Establishes a policy that no annexations of privately-owned land located outside the adopted sphere of influence shall be allowed;

4. Establishes a policy that annexation of District-owned lands located outside the adopted sphere of influence may be permitted but that upon their sale, the District shall seek their detachment;

5. Establishes criteria for amending the adopted sphere of influence related to contiguity, an established need for mosquito abatement services, service capability, and net cost to the District; AND


In a related action, the Commission encouraged NCMAD to develop a long-range program for solving its potential future financial problems. Said program may include some or all of the following elements:

1. the adoption of fees for servicing all public and private sewage disposal ponds,
2. the calling of an election to approve a district-wide mosquito abatement tax,

3. the continued purchase of fuel, pesticides, and major equipment in coordination with Napa County and/or other mosquito abatement districts, AND

4. the contracting with Napa County for telephone answering services.

Finally the Commission encourage Napa County and NCMAD to continue to work together to provide mosquito and other nuisance insect abatement services within the County in the most cost effective manner possible.
APPENDIX A

Status Report
Napa County Mosquito Abatement District
1984

Purpose

The Napa County Mosquito Abatement District (i.e., NCMAD) was established in 1925 because of a concern over the large insect populations in the southern part of Napa County and a growing awareness of the practicality of controlling insects on a county-wide basis. Its purpose was and still is to provide abatement of insects jeopardizing the health of Napa County residents and their animals. This district's formation provided the mechanism whereby the residents of Napa County could obtain, through use of their property taxes, a higher level of nuisance insect control than was previously available.

Services Offered

The services that NCMAD can provide are controlled by the Mosquito Abatement Act of 1915 (i.e., Sections 2200-2398 of the California Health and Safety Code). They include the following:

1. Mosquito, fly, and other nuisance insect extermination
2. Nuisance insect breeding site identification
3. Water control device construction and maintenance when critical to nuisance insect abatement
4. Rat extermination
5. Algae monitoring and control.

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NCMAD currently provides the first 3 services listed with respect to mosquitos and occasionally midges. The District presently does not provide other nuisance insect eradication, rat extermination or algae control and there are no plans to provide such services in the future. None of the services currently offered are provided by contract with another governmental entity. However, aerial applications of pesticides over the large wetland areas in the southern part of the County are carried out through contracts with private firms.

Area Served

NCMAD covers 512,580 acres, the entirety of Napa County (see Figure A-1). The current population of the County is 101,700 people. It is projected to increase in the next ten years to approximately 121,000 people. By that time an estimated 360 acres of additional industrial development and 324 acres of additional commercial facilities are anticipated to have been constructed within Napa County. Even with this projected development, it is estimated that at least 10,000 acres of vacant, developable land will still remain within NCMAD's boundaries in 1995. /1/

NCMAD currently provides some service outside its own boundaries. General insect abatement is provided in the Skaggs Island Area of Sonoma County via a contract with the U.S. Navy. This service is provided at approximately the District's cost, for elimination of any potentially migrating insect populations in this area directly benefits the District.

Service Area Changes

There have been no annexations, detachments or any other changes in NCMAD's service area since its formation nor are any anticipated in the future.

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Staffing and Facilities

NCMAD is governed by a five-member Board of Trustees appointed to staggered two-year terms of office. Each of the councils of the four incorporated cities in Napa County appoints one member. The County Board of Supervisors appoints the fifth person.

NCMAD's staff presently consists of 1 district manager, who serves as the chief administrative officer for the District, 1 field supervisor, 2 field technicians, and 1 half-time secretary. This is a reduction of 1 1/2 employees from the six full-time staff members employed prior to the passage of Proposition 13 in 1978.

NCMAD's facilities include a 6,075 square foot office/maintenance shop located on land off West Imola Avenue leased from the Napa Sanitation District (see Figure A-1). The building contains the following major pieces of equipment:

- 4 Half-Ton Pickup Trucks
- 5 Fixed Sprayers
- 2 Boats with Outboard Engines
- 1 Boat Trailer
- 1 Fish Storage Tank

These facilities and the present level of staffing allow the District to put 3 to 4 one-man units in the field at any one time with an office support staff of from 1 to 1 1/2 persons. This is adequate to meet all the District's primary mosquito abatement responsibilities. However, it is inadequate to allow NCMAD to maintain its business office open all day. To achieve that objective the District would have to hire an additional half-time secretary.

The District's present staffing level is not expected to be adequate to fulfill NCMAD's mosquito abatement responsibilities in the future. While projected population increases are expected to cause only minimal increases in service demand, the construction of new wineries and other developments requiring sewage disposal pond installation will increase the District's workload substantially. By 1995 it is estimated that NCMAD will need 6 1/2 full-time employees in order to maintain an adequate level of service.

No formal mutual aid agreements exist between NCMAD and adjacent mosquito abatement districts. However, NCMAD supplements its efforts in the high service demand area in southern Napa County by coordinating its abatement services with the Solano and Marin/Sonoma Mosquito Abatement Districts.
Workload

NCMAD receives approximately 600 service calls per year. In the spring (i.e., April-mid July) the number of calls received often exceeds 4 per day. However, throughout the remainder of the year the District only receives on the average about 1 service call per day. The majority of these calls are requests from property owners for either inspection of potential insect nuisances or spraying. Typically response times are a week or less.

In addition to its response to calls from County residents, NCMAD provides a regular program of mosquito abatement. In the fall and winter weed control and ditch maintenance are undertaken while in the spring and summer surveillance and spraying are the District's chief concerns. Mosquito fish collection and stocking and the inspection and servicing of the approximately 50 existing sewage disposal ponds present are year-round tasks.

Financial Considerations

NCMAD's expenditures for Fiscal Year 1982-83 were $177,689. Since Fiscal Year 1978-79, NCMAD's budget has increased about 48% or just over 10% per year.

NCMAD currently has four main sources of revenue:

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<th>Source</th>
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<td>1. property tax</td>
<td>$112,346 (67%)</td>
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<tr>
<td>2. augmentation funds</td>
<td>$ 35,000 (21%)</td>
</tr>
<tr>
<td>3. service fees</td>
<td>$ 11,385 (7%)</td>
</tr>
<tr>
<td>4. interest</td>
<td>$  9,515 (5%)</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>$168,386</strong>/3/</td>
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3/ Total revenues excluding carry-over for capital expenditures from previous years.
Property taxes are NCMAD's most important source of revenue, providing over 65% of the District's total income. Because of the County-wide nature of this district, NCMAD's share of the property tax remains essentially constant from year to year at .3417%. Presently the average Napa County homeowner, with a house assessed at $65,000, contributes approximately $2.25 to the annual service budget of NCMAD.

Special district augmentation funds account for the second largest portion of NCMAD's income. The District's share of augmentation funds is subject to review every year. In each of the last three years, NCMAD has successfully demonstrated its need for additional revenue and received at least $30,000 even though it has contributed less than $11,000 per year to the underlying fund. It appears that as long as NCMAD's expenditure requirements remain above its total revenues from other sources, NCMAD will continue receiving revenues from the Special District Augmentation Fund at levels proportional to the District's revenue needs.

NCMAD consistently carries a general reserve balance of approximately $30,000 and a contingency fund balance of about $40,000. The reserve fund covers "dry-period financing", a budgetary peculiarity common to those districts governed by independent boards. Due to the payment schedule used by the County, NCMAD must operate during the early part of each fiscal year, coincidentally one of highest spending periods for mosquito abatement, without sufficient revenues. Therefore, to avoid the high costs of borrowing funds to cover its shortage in working capital, NCMAD maintains a large enough reserve fund to carry it through this deficit period. The reserve fund also serves as an informal contingency fund. If emergency insect abatement is required, NCMAD could utilize these monies to supplement the regular contingency fund, thereby expediting provision of necessary services. Finally, the reserve fund is periodically utilized to store monies allotted for major equipment purchases that the District cannot completely finance in one fiscal year.

NCMAD's expenditures over the next ten years are expected to increase at an annual rate of approximately 12%, assuming completely adequate service levels are maintained. On the other hand, its revenues are anticipated to increase at a rate of only about 8.5% annually. Therefore, by 1995 NCMAD will require approximately $120,000 (in 1984-85 dollars) more per year in revenues than current sources are expected to provide. Even if service levels are allowed to fall a shortfall of nearly $45,000 per year is anticipated. These projected shortfalls could be reduced in several ways. Small reductions in District expenditures may be realized through changes in the District's operations. More importantly, NCMAD's revenues may be increased by instituting a
small district-wide mosquito abatement tax or a sewage pond service fee. To maintain completely adequate service, the tax imposed would have to be on the order of $2.45/year/household (in 1984/85 dollars). Imposition of such a tax have to be approved by a two-thirds affirmative vote of the District's residents. The sewage pond service fee needed could be as little as $700/year/pond complex (in 1984/85 dollars) and would not require voter approval. Another revenue source that could be used is federal revenue sharing funds. These funds, which may be available only through Fiscal Year 1986/87, would not appear to provide the steady source of income needed by the District to pay for its ongoing operations.

Service Constraints

The success of nuisance insect abatement service is linked to the speed with which any particular infestation can be identified and appropriate service measures implemented, thereby minimizing the opportunity for the insect larvae to mature and spread. Therefore, the main factors that determine a mosquito abatement district's overall service capability are

1. district facilities locations
2. staff/equipment availability

NCMAD's current facilities are located so as to give the District the ability to effectively serve any portion of the 512,580-acre Study Area. Therefore, within this area travel time is not a constraint on NCMAD's service ability.

NCMAD's staff and equipment is presently adequate to respond to any service need within one week, quickly enough to insure containment and effective extermination of most nuisance insect populations. However, NCMAD will have to expand its staff in the future to keep pace with the increased service needs projected. Such an expansion appears difficult but feasible. Therefore, staffing has not been treated as a constraint on NCMAD's service ability either.

Based on the foregoing analysis, NCMAD appears capable of adequately serving the entirety of the Study Area (i.e. Napa County) now and in the foreseeable future.
Other Factors

There is at least one other agency in Napa County that provides services similar to those supplied by NCMAD. That is the Napa County Environmental Health Department (NCEHD). The NCEHD provides fly and other nuisance insect control. Like NCMAD, its purpose is to protect public health.
APPENDIX B

Resolution Establishing the
Napa County Mosquito Abatement District
Sphere of Influence Boundary Line & Policies

WHEREAS, the Napa County Local Agency Formation Commission (LAFCOM) has decided it is time to establish a sphere of influence for the Napa County Mosquito Abatement District, hereafter referred to as the District; and

WHEREAS, LAFCOM has properly noticed and held a public hearing on the establishment of said sphere of influence in accordance with Section 54774.1 of the California Government Code; and

WHEREAS, LAFCOM has fully considered the testimony both oral and written presented at said hearing and the information contained in the Draft Napa County Mosquito Abatement District 1984 Baseline Report; and

WHEREAS, LAFCOM has considered the eight (8) factors required under Section 54774 of the California Government Code and made the following findings in regard to each:

1. Maximum Service Area
   The maximum area the District can presently adequately provide mosquito abatement service covers approximately 513,000 acres, the entirety of Napa County. This area can not be increased without significant negative financial, and thus service provision, consequences.

2. Services Provided
   The services currently provided by the District include mosquito extermination, water control, and mosquito breeding site identification. Additional services the District could theoretically provide include other nuisance insect extermination, rat eradication, and algae control.

3. Population Growth
   The population of the District's proposed service area is expected to increase from 101,700 people in 1984 to approximately 121,000 people in 1995.

4. Projected Development
   Approximately 7,800 residential units and 324 acres of commercial development are projected for construction in the District's proposed service area in the next ten years. In addition, 360,000 square feet of industrial space is anticipated to be developed there during this same period. In total about 2,000 acres of land will be impacted, most of it in and around the City of Napa.

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5. Area-Wide Service Needs
The current and future service needs of the District's proposed service areas vary according to location. In the existing and proposed urban areas, they include public water, sanitary sewers, urban-level structural fire protection, emergency medical aid, police protection, street sweeping, street lighting, recreation, etc. In rural areas, the services needed include rural police and fire protection, environmental health services, and agricultural consulting services. Services such as mosquito abatement, road maintenance, erosion protection and flood control are needed in all areas. The District is only suited to provide mosquito abatement services.

6. Other Local Service Agencies
There are over 45 other local governmental entities besides the District that provide service in the District's proposed service area. They range from large multi-purpose agencies like the County itself to small special purpose districts like the Pope Valley Public Cemetery District. None of these entities, except possibly Napa Cemetery, is capable of providing nuisance insect control.

7. Social and Economic Interdependence Between Areas Inside the District and Surrounding Lands
The District's proposed service area contains three incorporated cities, one incorporated town, two moderate-size unincorporated communities, and about 10 smaller village-sized developed areas. The remainder of the proposed service area is made up primarily of unincorporated rural lands. Each city, town, and local area involved is tied together by close social, economic, and political ties. Similarly, except in the case of the Knoxville, Gordon Valley and Lovall Valley Areas, these same factors tie each of these areas to one another and to Napa County itself. In these latter 3 cases, access and/or remote location lead to the area involved being tied to communities located outside the county and thus the District's proposed service area.

8. Agricultural Preserves
There are 269 agricultural preserves located within the District's proposed service area. Inclusion of these preserves within the District will have no effect on their viability.

WHEREAS, LAFCOM has determined that adoption of the Napa County Mosquito Abatement District Sphere of Influence will help promote the efficient and economic provision of mosquito abatement services; and

WHEREAS, LAFCOM has determined that adoption of said sphere of influence is exempt from environmental review under Section 15061(b)(3), of the State CEQA Guidelines.

NOW, THEREFORE, BE IT RESOLVED THAT LAFCOM does hereby adopt the following sphere of influence boundary line and policies for the Napa County Mosquito Abatement District:

1. Sphere of Influence Line

   A. A sphere of influence line has been adopted by LAFCOM for the Napa County Mosquito Abatement District which includes all lands, both incorporated and unincorporated, that

      1) lie within the existing boundaries of the District; AND

      2) can be efficiently and economically provided mosquito abatement service by the District.
B. For the purpose of identifying the geographic boundaries of the adopted Sphere of Influence, the attached map identified as "LAFCOM Sphere of Influence - Napa County Mosquito Abatement District", dated November 1984 is hereby adopted.

C. For the purpose of identifying the specific location of any portion of the boundary line of said Sphere of Influence, there shall be maintained in the LAFCOM Office a 1" = 2 mile scale map of said line, which map shall be identified as "LAFCOM Sphere of Influence - Napa County Mosquito Abatement District", dated November 1984.

2. General Sphere of Influence Policies

A. Basic Policies:

1) The basic policy of LAFCOM with respect to lands adjacent to the adopted Sphere of Influence is that lands outside Napa County should be served by the mosquito abatement district within the specific county involved.

B. Cooperative Planning & Development Programs:

1) The District's service area, as delineated by the adopted Sphere of Influence Line, having been developed by LAFCOM in cooperation with both the District and the County, should be recognized and considered as part of both District and County plans and development programs.

C. Annexations & Sphere Amendments:

1) Annexation of land located outside the District's adopted Sphere of Influence shall not be permitted except where such land is owned by the District and used to provide District services.

2) Annexation of District-owned land located outside the District's adopted Sphere of Influence shall be conditioned on the District seeking its detachment should such land be sold or cease to be used to provide District services.

3) Amendments to the adopted Sphere of Influence shall only be permitted where:

a) the territory is contiguous to the current sphere or a presently used service route to an area within said sphere;

b) each parcel involved has requested service from the District; AND

c) the territory is capable of being provided adequate mosquito abatement service at no net cost to the District. In determining net cost, a loss in ability to receive District Augmentation Funds shall be considered an expense.

3. Review Schedule

LAFCOM shall review the adopted Sphere of Influence Boundary Line and Policies for the District in 1989 at a time and on a date set by the Commission at their first meeting in that year.

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PASSED AND ADOPTED by the NAPA COUNTY LOCAL AGENCY FORMATION COMMISSION on the 28th day of November 1984 by the following vote:

AYES: Hunter, Moskowitz, Nelson, White, Greco

ABSTAIN: None

ABSENT: None

ARMAUD J. GRECO, Chairman
Napa County Local Agency
Formation Commission
LAFCOM
SPHERE OF INFLUENCE
NAPA COUNTY MOSQUITO ABATEMENT DISTRICT

NOVEMBER 1984

 Adopted Sphere of Influence Boundary

Current District

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