



## Town of Mammoth Lakes

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November 20, 2024

Office of Personnel Management

Submitted via Federal Rulemaking Portal <http://www.regulations.gov>

Docket ID OPM-2024-0016

RIN 3206-A069

**RE: Town of Mammoth Lakes Support for *Prevailing Rate Systems; Change in Criteria for Defining Appropriated Fund Federal Wage System Wage Areas.***

To Whom it May Concern:

Thank you for the opportunity to comment on the proposed rule “*Prevailing Rate Systems; Change in Criteria for Defining Appropriated Fund Federal Wage System Wage Areas.*” The Town of Mammoth Lakes **supports the inclusion of the whole of Inyo and Mono Counties in the Los Angeles Survey Area, Area of Application.** The economy of Mammoth Lakes, as well as that of surrounding Mono and Inyo Counties, are closely tied to Los Angeles and prices of key goods in Inyo and Mono counties closely reflect the prices of goods in Los Angeles in Southern California.

The Office of Personnel Management (OPM) rule as currently classifies Inyo and Mono Counties into three different sections, that don’t accurately reflect the cost of living in our area. From a cost-of-living perspective, Mammoth Lakes, Mono and Inyo Counties, all have closer ties to the Los Angeles area and a higher cost of living, and should be included in the Los Angeles Survey Area, Area of Application.

The Town of Mammoth Lakes, the only incorporated town in Mono County, is surrounded by the Inyo National Forest. Our economy is highly tourism-dependent, in large part due to the recreational opportunities on the public lands surrounding us. Our partnerships with the Inyo National Forest are invaluable, and our staff struggle with staffing shortages and turnover.

The high cost of living with low locality pay adjustments in Inyo and Mono Counties is having significant impacts on workers, including federal workers. The Inyo National Forest estimates that about 50% of prospective employees decline job offers due to lack of a locality pay and about 70% of employees who leave their jobs with the agency do so because of the lack of sufficient locality pay. This high rate of turnover is detrimental to the delivery of high-quality natural resource management and a robust visitor and outdoor recreation experience, which the American public has come to expect from our national forests. Fire management and wildfire response is one of the most important programs for the Inyo National Forest, protecting communities, sensitive wildlife habitat, cultural resources, and other ecosystem services such as critical water supply for urban areas like Los Angeles from the effects of catastrophic wildfire. Yet the Inyo carries one of the

highest vacancy rates (about 40%) for firefighters among forests in the entire state of California due to the lack of a locality pay and high cost of living.

Other local government and quasi-governmental agencies such as city government, county government, state government, the Los Angeles Department of Water and Power, and Southern California Edison, who have jobs that require similar levels of skill and expertise as jobs with the Forest Service, pay much higher wages than any jobs with the U.S. Government, oftentimes up to 50-75% higher. The result is that local federal agencies are losing qualified employees to other employers in the area who have taken into account the extremely high cost of living in the area and set their wages to ensure their employees can afford to live in the area, raising families and contributing to the organizations in the long term.

Attracting a diverse and skilled workforce into the future is critical to the success of the missions of these locally based federal jurisdictions. As a partner agency, we depend heavily on a strong and stable workforce such that our joint missions can effectively be carried out. As a region that is so directly connected to the important value of public land, losing skilled workers creates a unique threat to land management and protection – not to mention the local economy. Ultimately, Inyo County sees locality pay as a critical component to sustain the health, diversity, and access to one of the nation's most important assets – our public land system.

Thank you for the opportunity to comment on this proposed rule. We strongly encourage the OPM to consider all of Inyo County a part of the Los Angeles Survey Area, Area of Application, and provide a realistic locality pay adjustment to federal workers in our area.

Sincerely,

Bill Sauser  
Mayor