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Department of Fish and Game
Chad Dibble
830 S St.
Sacramento, CA 95811

August 30, 2011

Re: Conservation Strategy for Restoration of the Sacramento-San Joaquin Delta
Ecological Management Zone and the Sacramento and San Joaquin Valley
Regions

Chad Dibble,

The Sacramento-Yolo Mosquito and Vector Control District (District) appreciates this opportunity to comment on the Draft Conservation Strategy for Sacramento-San Joaquin Delta. The District is responsible for protecting the public from mosquito and other vector borne diseases in the California Delta and surrounding areas within Sacramento and Yolo Counties:

DAVID BROWN, MANAGER

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The District supports the California Department of Fish and Game's ongoing commitment to administering the original CALFED Ecosystem Restoration Plan (ERP) as one of the four interrelated objectives of the CALFED program. This update to the ERP Strategic Plan serves as a comprehensive restoration framework to be used by the more recently formed State agencies as mandated by the Delta Reform Act of 2009. However, there are several additions and guidelines that should be included in the draft strategy.

Of primary concern is the absence of any language detailing the importance of controlling mosquito production within wetland or riparian habitats as an integral portion of protecting public health and disease prevention within Delta communities. While environmental concerns are important and should be considered, preventing mosquito production is ultimately the responsibility of the property owner as defined by the California Health and Safety Code §2060, and subject to abatement by the local mosquito and vector control agency.

Comments listed below are responses that should be considered in the final revisions of the Draft Strategy.

- Drawing on previous work by the Central Valley Joint Venture Working Group, the District and the California Department of Public Health (CDPH) have compiled a list of Mosquito Reduction Best Management Practices (BMPs) for a variety of land uses

including managed wetlands and habitats. The Best Management Practices for Mosquito Control in California manual can be found on the CDPH website at http://www.westnile.ca.gov/downloads.php?download_id=2018&filename=BMPforMosquitoControl06-11.pdf and should be included in the Draft Strategic plan.

The Delta Protection Commission adopted and released a Land Use & Resource Management Plan for the Primary Zone of the Delta that included a mandate under Natural Resources P-10 that all managed aquatic habitats shall incorporate BMPs to minimize mosquito production. Policy 10 also dictates that managed wetland and riparian habitat projects coordinate all activities with the local vector control district. This policy has already undergone extensive public review. To maintain consistency with past sound practices in the Delta, Natural Resources Policy 10 must be included within the Draft Strategy in addition to a general reference of mosquito control BMP's.

- As of October 31, 2011 all mosquito and vector control chemical applications over Jurisdictional Waters of the U.S. are subject to National Pollutant Discharge Elimination System (NPDES) permitting and Clean Water Act compliance. The California State Water Resource Control Board (SWRCB) adopted the NPDES for Vector Control permit which contains specific BMP, application, and water quality guidelines that must be followed. Included in the permit are requirements for vector control districts to pursue mosquito reducing BMPs and sound IPM as an integral portion of mosquito control activities. These specific guidelines may have significant impacts to vector control districts in protecting the public from vector borne diseases in and around delta communities. To ensure compliance with NPDES permit requirements it is crucial for all habitat restoration activities to coordinate all restoration activities with the local vector control agencies, implement mosquito reducing BMPs, and provide routine maintenance of all restored aquatic wetland and riparian habitats.

California mosquito and vector control agencies are facing new challenges with shrinking budgets, coupled with the costs of NPDES, ESA and other environmental compliancy issues. If not properly designed and managed, restored aquatic habitats may have a demonstrably adverse impact on the citizenry and wildlife due to the increase in mosquito production.

Sincerely,



David Brown

Manager,

Sacramento-Yolo Mosquito and Vector Control District