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Delta Stewardship Council
980 Ninth Street, Suite 1500
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Attn: Terry Macaulay

February 2, 2012

Re: Delta Plan Draft PEIR

On behalf of the Sacramento-Yolo Mosquito and Vector Control District (District) the following comments are submitted for inclusion into the PEIR for the Delta Plan. Due to the generalized nature of the Draft Programmatic Environmental Impact Report (PEIR) and lack of specific projects for which the environmental impacts can be evaluated, it is difficult to provide specific comments; however several notable deficiencies were noted and must be addressed in the Final PEIR.

The Draft PEIR briefly discusses the various encephalitis viruses and diseases associated with local mosquito species. This plan must also include new and emerging diseases as well as the likely introduction of new or exotic mosquito species and their related diseases.

As detailed in the draft PEIR, Alameda, Contra-Costa, Sacramento, San Joaquin, and Yolo counties have county-wide special district mosquito and vector control programs. It must be noted that all mosquito Districts within the State of California, including the District are formed pursuant to the California Health and Safety Code Division 3, Chapters 1-2, Sections 2000 and are authorized to enforce section 2060 which includes the abatement of public health nuisances.

While various mitigation measures discussed in the Draft PEIR may reduce impacts to public health caused by mosquitoes and other vectors, the affects to the local agencies must also be addressed. The long term costs associated with increases in mosquito breeding habitats must be addressed including the limitations imposed by federal and state regulations affecting mosquito control in and around protected habitats, waterways, and endangered species.

The following comments related to individual sections as outlined in the Draft PEIR, section 14.

14.5.3.2.3 The increase of potential mosquito breeding habitat as a direct result of various ecosystem restoration projects was discussed and addressed by way of reference to the Suisun Marsh Restoration Plan. The California Department of Public Health has developed and published a Best Management Practices for Mosquito Control in California Manual (BMPs). The BMP manual should be included and referenced where appropriate in the Final PEIR. The BMP manual identifies management practices that, when routinely maintained may reduce or eliminate mosquito production. Please note in the Final PEIR that all future individual site specific environmental analysis and review must be sent to the respective mosquito Districts for review and comment prior to project approval and construction.

14.5.3.4.3 The Draft PEIR cited two past flood risk reduction projects within the California Delta region. Other potential listed project proposals must also be addressed and their impacts to vector control. Of particular concern are projects that involve setback levees, floodplain expansion and subsidence reversal. These potential projects will have a significant impact on mosquito production if not properly mitigated. Mitigation measures must include routine maintenance, implementation of BMPs and include active participation from the local mosquito and vector control districts throughout the planning process to ensure compliance with the Ca Health and Safety Code.

14.5.3.6.3 The addition of routine maintenance, water and vegetation management, and general BMP implementation should be added to the listed mitigation measures. In addition, a requirement that all site specific projects include the active participation and comments from the local Mosquito and Vector Control District prior to project approval and implementation.

The listed project alternatives include varying degrees of habitat creation, manipulation and management. If implemented the measures described in the Draft PEIR should also be included and required to protect the public from vector borne diseases.

Thank you for the opportunity to provide comments.

Sincerely,



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