

**Mosquito and Vector Control
Association of California**
1215 K Street, Suite 2290
Sacramento, CA 95814
p: 916.440.0826 f: 916.231.2141
www.mvcac.org

January 28, 2011

Ms. Terry Macaulay
Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA 95814
Via electronic mail: deltaplanscoping@deltacouncil.ca.gov

Re: Public Scoping Comments Regarding Notice of Preparation of Draft Environmental Impact Report for Delta Plan by Delta Stewardship Council

Dear Ms. Macaulay:

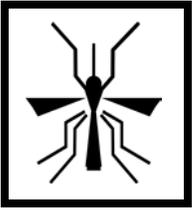
I am submitting these comments on behalf of the 65 member agencies of the Mosquito and Vector Control Association of California, (MVCAC) which are charged with protecting the health of Californians from mosquitoes and the diseases they transmit.

We understand the importance and value of wetlands and have first-hand experience with the potential conflict with mosquito production. As additional planning and evaluation is completed as part of this EIR process, Best Management Practices (BMPs) to minimize mosquito production need to be considered and addressed up front by the lead agency (if for no other reason than to demonstrate a good faith commitment to address the future implementation and management costs of the Delta Plan strategies and subgoals).

The MVCAC, California Department of Public Health—Vector-borne Disease Section, and University of California worked together to produce a set of guidelines for [Best Management Practices for Mosquito Control on California State Properties](#) (available for download at <http://www.westnile.ca.gov/resources.php>). We would like to add mosquito BMPs implementation throughout the document and add public health and mosquito production to the potential effects of the Plan implementation that the EIR would address. This document includes many common mosquito sources and specific steps for minimizing mosquito production.

We would also like to include consultation with the local mosquito and vector control districts as part of the requirements prior to any habitat restoration and management activities as a result of implementation of the Delta Plan and BDCP.

The shift or change in flooding or wetting period on flood plain wetlands may alter current habitat values and land uses. Depending on the timing, design, and duration of the flooding, the plant composition may change significantly and some agricultural practices may no longer be feasible which may result in increased mosquito production. For example, later flooding that goes beyond the typical



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late March drawdown may delay or eliminate the germination and growth of beneficial moist soil plants and allow less desirable species such as cocklebur or other vegetation that may negatively affect mosquito abatement. On agricultural lands subject to longer flooding, the viability of farming may be jeopardized and result in fallowed areas with dense vegetation which may also negatively affect mosquito abatement.

While tidal wetlands are generally less favorable to mosquito production, their design will be an important factor in order to avoid backwater and ponded areas on the marsh plain. Backwater and ponds would require abatement and potentially result in a conflict between balancing aquatic food web resources and human health and safety.

I appreciate the opportunity to comment. I would welcome the opportunity to meet with the Delta Stewardship Council or staff to discuss how the Delta Plan can meet its many goals while still protecting the health of Californians.

Sincerely,

A handwritten signature in black ink that reads "Catherine Smith". The script is cursive and fluid.

Catherine Smith
Executive Director