



Coachella Valley Mosquito and Vector Control District

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March 6, 2015

To: Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Subject: Comments regarding the Status of the Salton Sea and Revised Order
WRO 2002-0013

Dear Members of the State Water Resources Control Board

Thank you for the opportunity to express the position and concern of the Coachella Valley Mosquito and Vector Control District (hereafter, the District) regarding the status of the Salton Sea.

The District is a non-enterprise independent special district accountable to the citizens of the Coachella Valley, charged with the protection of public health through the control of vectors and vector-borne diseases within its boundaries. We operate under the California Health and Safety Code Division 3, Sections 2000-2910 (known as the Mosquito Abatement and Vector Control District Law). Our activities include the prevention and control of mosquitoes, filth flies, eye gnats, and the red imported fire ant.

The Salton Sea normally receives inflows from agricultural channels. As the Sea has receded, the water in those channels no longer flows into the Sea; the freshwater pours out onto previously dry land, creating marshes (please see presentation slides for pictures). These marshes are thought of by some as restoration habitat for birds; yet, they are impenetrable areas of mosquito breeding. The wetted soil is too soft for technicians to walk on, and is dangerous for equipment to be used. Cattails, bulrush, and tamarisk grow quickly into thickets which are difficult to get through.

The long-term implications of allowing the Sea to dry have been expounded upon by many experts. What has been ignored is the immediate risk that the increase in the number of mosquitoes poses to the people living in the area and in the Coachella Valley. The mosquitoes, primarily the southern house mosquito (*Culex quinquefasciatus*) and the encephalitis mosquito (*Culex tarsalis*), prefer to feed on birds and are excellent vectors of West Nile virus (WNV). WNV was introduced to the Coachella Valley in 2003, and it has quickly become the focus of the work

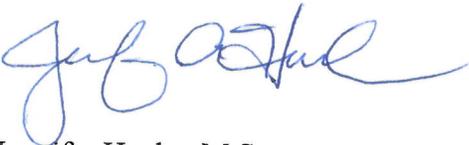
at our District. In 2014, more samples of California mosquitoes tested positive for WNV than any other year, and it saw the second highest number of humans infected with WNV since its introduction to the state. While WNV causes illness and death in humans, it is primarily a disease of birds. As part of the Pacific Flyway, numerous birds visit and live in the area around the Sea. The impact of WNV on these birds is not fully understood.

Whether the State Water Resources Control Board chooses to adjust the WRO or not, the Salton Sea will continue to recede. The movement to water-efficient irrigation and the conversion of agricultural fields to residential housing will continue to reduce the amount of water in the channels feeding the Sea in Coachella Valley. However, the Water Board can impact our work.

1. The Water Board can make it easier for the channels to be cleared to allow the water to flow directly into the Sea. The channels are maintained by Coachella Valley Water District. Flowing water does not breed mosquitoes. We would prefer to see the channels extended into the Sea and maintained at least annually.
2. If marshes are to develop, encourage the placement of paths around and through the marshes so that mosquito control treatments can be easily made. If marshes are greater than 20 ft. wide, multiple paths may be needed to provide adequate coverage by control product applications. If paths are not able to be made, the District will need access to make aerial applications of control products.
3. Encourage participants to use the Salton Sea Multiple Species Habitat Conservation Plan. Appendix F is the Mosquito Control Plan. While some new active ingredients of control products are available and have been approved for use by the State Water Board, the principles and thresholds in this plan are necessary for the protection of the people in the area.

We appreciate the State Water Board taking the time to review this important issue. We are happy to provide any additional information that might be of assistance.

Sincerely,



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cc: Branka B. Lothrop, Ph.D., General Manager
Jeremy Wittie, M.S., Scientific Operations Manager