



Coachella Valley Mosquito and Vector Control District

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December 30, 2015

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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 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 red imported fire ants.

We are pleased to see attention brought back to the Salton Sea and the need for action formally recognized. The District supports the Salton Sea Task Force's assessment that the Salton Sea Management Program will need strong state, federal, and local partnerships, committed participation from stakeholders, and clear and achievable milestones. At the same time, the District would like to use this opportunity to once again emphasize the need for wetland habitat maintenance plans around the Salton Sea. The reason for establishing wetland habitat maintenance plans is the immediate risk that mosquitoes pose 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 mosquito-borne viruses. As part of the Pacific Flyway, numerous birds visit and live in the area around the Salton Sea. While the Salton Sea and adjacent wetlands provide desirable habitats for birds, at the same time, it needs to be recognized that some birds are the primary hosts for mosquito-borne

viruses, such as West Nile virus (WNV) and St. Louis Encephalitis virus (SLE) which can cause illness and death in humans and other mammals.

The West Nile virus (WNV) was introduced to the Coachella Valley in 2003, and it has quickly become the focus of the work at our District and other districts in California. In 2014, more samples of California mosquitoes tested positive for WNV than any other year. In 2015, after 12 years, SLE virus has returned to the area, and the District staff confirmed 38 positive mosquito samples, in addition to 99 WNV positive mosquito samples in the Coachella Valley. To date, Riverside County has 128 confirmed WNV symptomatic human cases in 2015 with two human cases detected in the Coachella Valley.

It is important to ensure that the agencies develop wetland habitat maintenance plans and that funding is made available for maintaining the habitat. Without this, the District will have continued problems with the agricultural channels which flow into the Salton Sea. 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. 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. Without regular maintenance, these areas will continue to allow for the development of mosquitoes and the maintenance of the vector-borne diseases that they transmit.

As the Natural Resources Agency and the Salton Sea Task Force work to accelerate project implementation and delivery, we are concerned that accelerating planning and permitting will neglect the importance of development of maintenance plans for preventing mosquito breeding in those areas. The District encourages the use of 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 also encourage referring to the Mosquito and Vector Control Association of California (MVCAC)'s White Paper: How Better Planning and Use of the California Environmental Quality Act Can Prevent Mosquitoes and Vector-Borne Disease¹. This document includes case studies that identify common problems and recommended solutions and is intended to help lead agencies manage, analyze, and address the impacts of mosquito and vector breeding. The California Department of Public Health with the MVCAC developed the Best Management Practices for Mosquito Control in California² in 2012. This document includes design and maintenance guidelines for wetlands which can help to reduce mosquitoes and make it easier to treat for mosquitoes when they do develop.

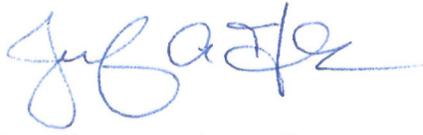
We appreciate the State Water Board taking the time to review this important issue. We are happy to provide any additional information that might be of assistance.

¹ MVCAC CEQA White Paper, www.mvcac.org – “Legislation/Advocacy – White Papers.”

² CDPH BMPs for Mosquito Control in California,

www.cdph.ca.gov/HealthInfo/discond/Pages/MosquitoBorneDiseases.aspx – “Mosquito Surveillance and Control Information.”

Sincerely,

A handwritten signature in blue ink, appearing to read "JHenke". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jennifer A. Henke, M.S.
Environmental Biologist
JHenke@cvmvcd.org

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