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July 6, 2009

Ms. Mona Dougherty
Water Resource Control Engineer
North Coast Regional Water Quality Control Board
5550 Skylane Boulevard, Suite A
Santa Rosa, CA. 95403

Re: Draft Storm Water Permit for Santa Rosa, Sonoma County, and the Sonoma County Water Agency

Dear Ms. Dougherty:

The Marin/Sonoma Mosquito and Vector Control District (MSMVCD) has reviewed the draft storm water permit for Santa Rosa, Sonoma County, and the Sonoma County Water Agency. There are several elements within the draft permit that will address current issues involving storm water treatment systems and mosquito control. The following provisions in the draft permit have the potential to reduce and perhaps eliminate mosquito and vector habitat within storm water Best Management Practices (BMPs), decrease the potential for mosquito-borne disease transmission, reduce mosquito control operations, and the need for repeated applications of mosquito larvicides to storm water treatment systems.

- Priority toward Low Impact Development, landscape-based treatment, and the use of vegetated soil in storm water treatment
- Development of tracking, inspection, and enforcement systems for post construction BMPs
- Verification of maintenance provisions for post-construction BMPs
- Regular inspection of post construction BMPs to assess operation conditions including vector risk
- Provide data and observations on local effectiveness and performance of BMPs and conduct a BMP Effectiveness Special Study
- Visual flow monitoring – monitor flows in streams and storm drains to detect excessive summertime flows or abnormal discharges
- Required investigation and tracking of all discharge complaints
- A BMP plan for all authorized non-storm water discharges
- Laguna De Santa Rosa TMDL and storm drain outfall monitoring

Over the last several years management, maintenance, design, and function of storm water treatment systems has been an issue with respect to mosquito and vector

production and control operations in both Marin and Sonoma counties. MSMVCD has spent substantial staff time and resources toward correcting problematic situations that could have been avoided through proper design, management, and maintenance. MSMVCD strongly supports requirements in the draft storm water permit for verification of maintenance provisions, the development of tracking and inspection systems, and an enforcement program for post construction storm water BMPs.

Storm water retention basins, in particular, have been problematic in recent years. MSMVCD has found that retention basins do not drain within seventy-two hours, often hold water through the summer months, contain dense and abundant populations of undesirable vegetation, provide habitat for mosquitoes, and have involved difficult mosquito control operations.

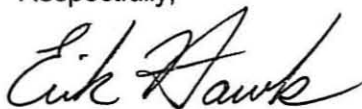
MSMVCD supports Low Impact Development (LID), landscape-based types of storm water BMPs, and the use of vegetated soil in storm water treatment. Implementing LID treatment and moving away from the use of large storm water retention basins and swales will reduce the potential for mosquito production and mosquito control operations in association with storm water treatment systems in Sonoma County.

Non-storm water discharges both authorized and unauthorized are of potential concern to MSMVCD. MSMVCD is supportive of language in the draft permit that requires investigation and tracking of all discharge complaints and BMP plans be developed for all authorized non-storm water discharges. MSMVCD requests to be notified of unauthorized discharges. MSMVCD will monitor discharges for mosquito production and notify the appropriate agency should a problem arise.

Given the current water quality issues, invasion of water primrose (*Ludwigia* sp.), and mosquito production issues in portions of the Laguna De Santa Rosa, MSMVCD is supportive of the Laguna TMDL and the outfall monitoring included in the draft permit. The section of the Laguna De Santa Rosa between Occidental and Guerneville Roads and the flood control channels in Rohnert Park and Cotati are especially problematic with regard to mosquito control and potential public health issues.

MSMVCD appreciates that mosquito and vector control is included in the draft permit and also the opportunity to review the draft permit and provide comment. If you should have any questions please contact me at 707-285-2209.

Respectfully,

A handwritten signature in black ink, appearing to read "Erik Hawk". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Erik Hawk
Special Projects Supervisor/Biologist