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April 4, 2007

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Mr. Jeremy Haas
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA 92123

RE: Tentative Order No. R9-2007-0002,
The Orange County Municipal Storm Water
Permit for the San Diego Region

Dear Mr. Haas:

Concerning Tentative Order No. R9-2007-0002, the Orange County Municipal Storm Water Permit for the San Diego Region, the Orange County Vector Control District (The District) would like make the following comments;

- The District recognizes the intricate relationship of a water quality issues and public health concerns as they relate to the potential for storm water treatment control BMPs (i.e. media filters, vault separator units, bioswales, extended detention basins, constructed wetlands and the like) to become mosquito breeding sources if not properly designed and regularly maintained.
- The District urges that storm water treatment control BMPs which are required by the aforementioned permit and other water quality regulations need to be assessed, selected, and implemented by the Copermitees (or other responsible parties) with vector minimization principles in mind and long-term maintenance funding in place.
- Vector control agencies are charged with protecting public health by reducing the possibility of vector-borne disease. It is our hope that the possibility of mosquito production be addressed at the earliest stages of project planning and permitting processes. Clarification of long-term ownership and provisions for regular maintenance to minimize mosquito production are also concerns than need to be addressed at the outset. The ordeal of retrofitting to correct problems resulting from omitting vector control considerations are far more onerous than the proactive alternative.

"An Independent Special District Serving Orange County Since 1947"

The mission of the Orange County Vector Control District is to provide the citizens of Orange County with the highest level of protection from vectors and vector-borne diseases.

Mr. Haas

April 4, 2007

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We are looking forward to attending the public hearing on April 11, 2007 and welcome any feedback or questions you may have.

Sincerely,

A handwritten signature in black ink that reads "Amber Semrow". The signature is written in a cursive, flowing style.

Amber Semrow
Biologist, OCVCD