



Coachella Valley Mosquito and Vector Control District

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July 14, 2014



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To: Clerk to the Board

Subject: Proposed Emergency Regulation: Prohibition of Activities and
Mandatory Actions during Drought Emergency

Dear 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 Proposed Emergency Regulations. Our comments are limited to Article X Section X.1 Prohibited Activities in Promotion of Water Conservation.

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. The District operates under the California Health and Safety Code Division 3, Sections 2000-2910 (known as the Mosquito Abatement and Vector Control District Law). The District has a cooperative agreement with the Vector-Borne Disease Section of the California Department of Public Health (CDPH) as described in California Health and Safety Code (Section 116180).

The District supports water conservation. Water that is permitted to run-off of properties and into storm water structures has the potential to breed mosquitoes. These storm water structures, when they hold nuisance water from irrigation run-off, washing of hardscapes, and washing of cars, are not flushed clean as designed, and a small amount of water is allowed to sit below outlet pipes. This water, although it may receive daily inputs from the surrounding neighborhood, is enough for mosquitoes to complete their development, bringing mosquitoes in close contact with people. Not every place where water is allowed to stand and become stagnant has breeding mosquitoes; yet the reduction of standing water allows for all mosquito control agencies to better focus their efforts on permanent sources of mosquitoes instead of artificial habitats in catch basins, drywells, and retention basins.

The District, under the Mosquito Abatement and Vector Control District Law, does have the ability to abate property owners who allow for mosquitoes and other vectors to breed on their properties. Since not all standing water does breed mosquitoes, the District will not be abating standing water. We also are not an

enforcement agency, and so, we will not be writing tickets. However, we will include this language and educate our residents to encourage water conservation.

When California is no longer under a drought, we would encourage the State Water Board to consider ways to reduce nuisance water such as the regulations being put in for the drought.

If you have any questions, please contact me at jhenke@cvmvcd.org or 760-342-8287.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Henke". The signature is fluid and cursive, with the first name being more prominent.

Jennifer Henke, M.S.
Environmental Biologist

cc: Branka B. Lothrop, PhD
General Manager

Jeremy Wittie, M.S.
Scientific Operations Manager