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December 19, 2018

California Regional Water Quality Control Board  
San Francisco Bay Region  
Attn Dale Bowyer  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

Re: California Department of Transportation Cease and Desist Order

Dear Mr. Bowyer,

Thank you for the opportunity to express the position of the Contra Costa Mosquito & Vector Control District (the District) regarding the tentative cease and desist order requiring the California Department of Transportation to achieve compliance with the San Francisco Bay Region-specific timely implementation of trash control measures under the NPDES Statewide Stormwater Permit.

The District is tasked with reducing the risk of diseases spread through vectors within Contra Costa County by controlling them in a responsible, environmentally-conscious manner. A “vector” means any animal capable of transmitting the causative agent of human disease or capable of producing human discomfort or injury, including, but not limited to, mosquitoes, flies, mites, ticks, other arthropods, and rodents and other vertebrates (California Health and Safety Code §2002). Property owners retain the responsibility to ensure that the structure(s), device(s), and/or other features resulting from compliance with the tentative order do not breed or harbor vectors, or otherwise create a nuisance. Property owners must immediately abate any nuisance caused by the structure(s), device(s), and/or other feature(s). Maintaining a nuisance on any such properties may lead to abatement by the Contra Costa Mosquito & Vector Control District and civil penalties pursuant to California Health & Safety Code §2060-2067.

Stormwater conveyance, treatment, or trash capture features have the potential to produce standing water and vector breeding habitat, possibly creating a health hazard for neighborhood residents, workers, and visitors. Vector species that may breed in such habitats have the ability to affect not only nearby individuals, but potentially spread disease viruses to citizens several miles away. Historically, the District has observed various trash capture and stormwater treatment devices become ideal vector breeding habitat. Additionally, trash capture devices may impede access and limit the District’s disease vector surveillance and control efforts. Careful selection of capture devices should ensure ready access by District employees, and robust maintenance measures should prevent devices creating or maintaining a public nuisance. At no time should any device or feature attract, harbor, or breed vectors of any sort. If vector production is suspected, the District should be contacted immediately.

As always, please ensure District staff has safe, ready access for surveillance and control measures throughout the project area that fall within our jurisdiction. If further guidance on the selection and

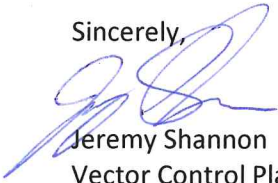
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implementation of devices is needed or vector-related issues arise, don't hesitate to reach out to the Contra Costa Mosquito & Vector Control District for assistance.

Sincerely,



Jeremy Shannon

Vector Control Planner

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