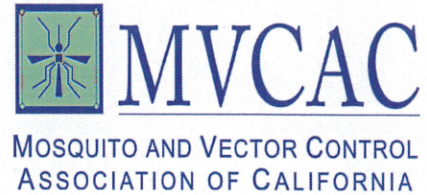


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January 11, 2013

VIA EMAIL and US MAIL

Cindy Messer, Delta Plan Program Manager
Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA 95814
eircomments@deltacouncil.ca.gov

Re: Comments – November 2012 Final Draft Delta Plan

Dear Ms. Messer:

On behalf of the Mosquito and Vector Control Association of California (MVCAC), we suggest incorporating reference to and use of the California Department of Public Health's Best Management Practices for Mosquito Control in California ("Mosquito Control BMP") to best accomplish the goals addressed in the Final Draft Delta Plan.

The Mosquito Control BMP was updated in July 2012 by the California Department of Public Health in collaboration with MVCAC to promote mosquito control in California and enhance early detection of West Nile virus. In 2012, deaths nationwide from West Nile virus reached a high of 243. In California, 18 deaths and 471 total cases were reported last year. The BMP contains many effective tools for reducing the risk of mosquito-borne diseases, such as West Nile Virus. It provides guidance on how to work with local mosquito and vector control agencies to develop and implement site-specific Integrated Pest Management (IPM) strategies that maximize the efficacy of chemical control measures, decrease total pesticide use, and successfully reduce or eliminate breeding sites.

We suggest the following edits to incorporate the Mosquito Control BMP into the Delta Plan to best ensure protection of water quality and public health in California. The suggested edits are provided below, shown in underline. Page and line numbers refer to the November 2012 Final Draft Delta Plan.

(1) Restore Habitat – Recommendations

Chapter 4

Page 157, lines 18-27

ER R1 Prioritize and Implement Projects that Restore Delta Habitat

Bay Delta Conservation Plan implementers, Department of Fish and Game, Department of Water Resources, and the Delta Conservancy should prioritize and implement habitat restoration projects in the areas shown in Figure 4-6. Habitat restoration projects should ensure connections between areas being restored and existing habitat areas and other elements of the landscape needed for the full life cycle of the species that will benefit from the restoration project. Where possible, restoration projects should also emphasize the potential for improving water quality.

Restoration project proponents should coordinate with local mosquito abatement districts and review, and incorporate where appropriate, the measures identified by the California Department of Public Health in its “Best Management Practices for Mosquito Control in California.”

(2) Glossary

Page 317, add the following:

Best Management Practices for Mosquito Control in California – California Department of Public Health (2012) Best Management Practices for Mosquito Control in California, available at <http://www.cdph.ca.gov/HealthInfo/discond/Documents/BMPforMosquitoControl07-12.pdf>. Additional resources at <http://www.westnile.ca.gov/resources.php>.

On behalf of the over 60 local government agencies that MVCAC represents, we thank you for considering incorporating the Mosquito Control BMP into the Delta Plan, and we sincerely hope that you will incorporate our changes noted above. This will ensure that together we can meet the dual goals of improving water quality and protecting the public health of California’s citizens.

Thank you for your time and consideration.

Most sincerely,



Catherine Smith
Executive Director