

MARIN / SONOMA MOSQUITO AND VECTOR CONTROL DISTRICT

First Organized District in California

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October 22, 2008

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

Dear Ms. Dougherty:

The Marin/Sonoma Mosquito and Vector Control District (District) appreciates the opportunity to review and comment on the Draft MS4 National Pollutant Discharge Elimination System Storm Water Permit for Santa Rosa and Sonoma County (storm water permit). The District understands the importance of storm water treatment and has an interest in the design, function, and maintenance of many types of storm water treatment systems. As you are aware, the District closely monitors storm water treatment systems for mosquito and vector production. The proper management and maintenance of storm water treatment systems is essential to minimize the potential for mosquito production and public health issues.

In reviewing the draft storm water permit I was pleased to find mosquito and vector inspection and abatement included, as well as an expectation for cooperation and collaboration between the Permittees and the District (pages. 5 and 33). The language in the draft storm water permit pertaining to overall management and maintenance and specifically vegetation management with respect to storm water treatment systems and drains (catch basins) will help to minimize mosquito production and the need for repeated mosquito larvicide treatments.

In Part 6 of the draft storm water permit titled Implementaiton of New Development/Redevelopoment Post-Construction BMPs (page 68); I was concerned with the 2 year inspection interval for post construction storm water best management practices (BMPs). The District has found that inspection and maintenance of post construction BMPs is often required on a more frequent basis, specifically with systems that include vegetation types that could potentially provide habitat for mosquitoes. The District requests that the 2 year inspection interval be reconsidered and the potential for a more frequent inspection requirement be discussed.

Thank you for considering the Districts request and I look forward to working with you. Please contact me at 707-285-2200.

Respectfully,



Erik Hawk
Special Projects Supervisor/Biologist

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