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SACRAMENTO-YOLO
**MOSQUITO
& VECTOR
CONTROL**
DISTRICT

CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, California 95814
Attention: Rick Breitenbach

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Elk Grove,
California
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RE: CALFED Bay-Delta Program Programmatic EIS/EIR and Phase II Interim Report

Dear Mr. Breitenbach:

Thank you for the opportunity to comment on the Draft Programmatic EIS/EIS and Phase II Interim Report. I am concerned that issues related to increased mosquito production and harborage sites due to the project have not been adequately addressed.

The Summary of Environmental Consequences section of the Programmatic EIS/EIR Executive summary states there would be "a gain in open space and or habitat uses, which would benefit recreational opportunities by restoring habitat, constructing levee improvements and conveyance facilities."

The plan does not adequately address the potential adverse health impacts from mosquitoes that will likely be created from the habitat restored. Adding 200,000 acres of mosquito habitat without providing monetary resources to the local districts responsible for controlling these mosquitoes will result in intolerable mosquito populations in and around the delta. Expecting local mosquito control districts to use existing resources to control an additional 200,000 acres of prime mosquito breeding habitat is unreasonable and contrary to the stated goals as outlined in the CALFED Bay-Delta Mission Statement and Solution Principles. The mitigation measures outlined in Section 8.0 of the EIS/EIR clearly redirect impacts to the mosquito and vector control districts. Mosquito control districts will require additional manpower, equipment and other resources to implement the Integrated Pest Management (IPM) programs we use to adequately control the mosquitoes and other vectors.

A second concern that has not been addressed is the reduction of local tax revenues when lands are purchased by state or federal entities. Mosquito control districts rely on property tax revenues. Suggesting expensive mitigation measures while reducing revenues to perform them is both unfair and unreasonable.

It is prudent for the CALFED proponents to recognize this potential adverse health affect to humans from an increase in the mosquito population and provide substantive mitigation measures to alleviate any redirected impact on mosquito control districts. While the stated mitigation measures are a good start, they lack the funding mechanism needed to ensure no redirected impact on mosquito control districts.

Thank you for the opportunity to provide these comments, and I look forward to working with you to develop measures that will be beneficial to all concerned.

Sincerely,
David Brown
David Brown
Manager

- MANAGER
David Brown
- 1998
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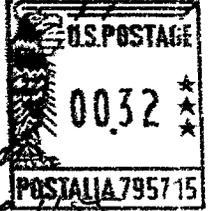
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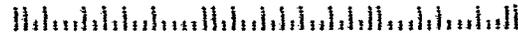
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