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Director & State Health Officer

State of California—Health and Human Services Agency
California Department of Public Health



EDMUND G. BROWN JR.
Governor

August 20, 2012

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street 24th floor
Sacramento, CA 95814



Dear Mrs. Townsend:

Subject: Draft Policy for Toxicity Assessment and Control

The Vector-Borne Disease Section of the California Department of Public Health (CDPH) is responsible for assisting local public agencies in preventing and controlling the spread of vectors and vector-borne diseases as described in the California Health and Safety Code (Section 116110). CDPH has reviewed the draft policy and supports the exemption for essential vector control activities provided in Part III (A) (9) (c) Categorical Exemptions (1) Seasonal exemption for pest control and vector control by public agencies to fulfill statutory requirements established in the California Health and Safety Code.

Page 11, Section (2)

At the request of CDPH, Brian Ogg of SWRCB provided clarification regarding section (2); that the reporting requirements in this section (2) are maintained without regard to inclusion of an agency in the categorical exemption provided in the previous section (1).

It is critical that vector control personnel and agencies have the flexibility to apply pesticides when needed to protect public health. The necessity of the ability to quickly react to changing conditions is recognized in an exemption from prior notification requirements in the California Food and Agriculture Code (Section 6620).

CDPH would oppose any reporting or notification requirements beyond the current Pesticide Application Plan submitted with each agency's NPDES General Vector Control Permit application and detailed annual report of pesticides applied to Waters of the United States.

Sincerely,

A handwritten signature in blue ink that reads "Vicki L. Kramer".

Vicki Kramer, Ph.D., Chief
Vector-Borne Disease Section