



RON CHAPMAN, MD, MPH
 Director & State Health Officer

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

Public Comment
 Caltrans MS4 Permit
 Deadline: 6/26/12 by 12 noon



EDMUND G. BROWN JR.
 Governor

June 21, 2012

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



Dear Mrs. Townsend:

Subject: Tentative Order No. 2012-XX-DWQ, NPDES No. CAS000003, Waste Discharge Requirements for State of California Department of Transportation.

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). We have carefully reviewed the April 27, 2012 revision to Tentative Order No. 2012-XX-DWQ and were pleased that the Board elected to include specific and concise language pertaining to vectors and vector management on page 44 (Section E.2.e.1). Additionally, we were pleased of the Board’s decision to include a new section on page 18 of the Fact Sheet titled “Potential Unintended Public Health Concerns Associated with Structural BMPs” that utilized much of the suggested language from our comment letter dated March 4, 2011. We did, however, find a few items in the revised text that should be clarified and respectfully request that the Board consider the following minor changes to ensure that Tentative Order No. 2012-XX-DWQ contains the most accurate and useful guidance for the State of California Department of Transportation.

Page 44, Section E.2.e.1 (Vector Control)

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Subsection a).

This subsection requires some clarification. Please consider adding the following language (in bold) to this subsection:

“All storm water BMPs that retain storm water shall be designed, operated and maintained to minimize mosquito production, and to drain within 96 hours of the end of a rain event, unless designed **and maintained** to control vectors. **Proprietary** BMPs shall be maintained at the frequency specified by the manufacturer. ~~This~~ **The drain-down limitation of 96 hours** does not

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apply in the Lake Tahoe Basin and in other high-elevation regions of the Sierra Nevada above 5000 feet elevation with similar alpine climates **between October 1 and April 15**. The Department shall operate and maintain all BMPs to prevent the propagation of vectors, including complying with applicable provisions of the California Health and Safety Code relating to vector control.”

Subsection b).

The CDPH has extensive, published documentation showing that the majority of stormwater BMPs installed by Caltrans, regardless of design, have potential to hold standing water long enough to provide larval habitat for mosquitoes. A complete inventory of stormwater BMPs and their location is crucial to allow local vector control agencies to periodically inspect all sites for presence of standing water and mosquito production. Please consider broadening the inventory requirement to include all structural BMPs, including those in the Lake Tahoe Basin or other regions of the Sierra Nevada above 5000 feet. We suggest that the subsection be revised to read as follows:

“The Department shall cooperate and coordinate with the California Department of Public Health (CDPH) and with local mosquito and vector control agencies on issues related to vector production in the Department’s structural BMPs. The Department shall prepare and maintain ~~an~~ **a statewide** inventory of structural BMPs. ~~that retain water for more than 96 hours. The inventory need not include BMPs in the Lake Tahoe Basin or other regions of the Sierra Nevada above 5000 feet.~~ The inventory shall be provided to CDPH in electronic format for distribution to local mosquito and vector control agencies. The inventory shall be provided in Year 2 of the permit and updated every two years.”

We appreciate the opportunity to comment on the revised draft Tentative Order and look forward to working with you in the future to ensure that vector concerns are adequately addressed in stormwater NPDES permits to protect the health of all Californians. If you have any questions, please contact Marco Metzger, Ph.D. at Marco.Metzger@cdph.ca.gov or (909) 937-3448.

Sincerely,



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