Comment – Coos County Board of Commissioners regarding Coos County Conditional Land Use Application: ACU-23-074/FP-23-012 Winter Lake Phase III project

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For reasons outlined below, we ask for the proposal submitted by BSDD to be amended to consider inclusion of plans that would minimize mosquito invasions in Garden Valley, as the proposed expansion of habitat restoration in the Coquille Valley Wildlife Area (CVWA) would likely result in continued and increasing mosquito populations.

In 2015, we bought a 5-acre property at 58494 Garden Valley Rd, which is within the boundaries of the Beaver Slough Drainage District (BSDD). As a side note, for many years Garden Valley residents that own land within the boundaries of BSDD have petitioned to withdraw their properties from the boundaries of BSDD.

Let me start by stating that in principle we are very supportive of land restoration efforts such as in the CVWA, and in fact had plans initially to propose restoration of China Creek in Garden Valley (GV). However, our main concern is that since completion of the Unit 2 restoration, mosquitos have been a major nuisance and health issue in the past 4 years for the Garden Valley residents.

Over time, as I learnt about the restoration plan of Unit 2 of the Winter Lake area and the need to replace the tidal gate for better control of irrigation, flooding and drainage in the Winter Lake area. The construction of the new tidal gate was completed in the fall of 2018. Until that time, after my purchase of the GV property in 2015, there had been no mosquito issue at any time during those years. However, GV residents started complaining about the mosquito issue in August of 2019, the year after the completion of the tidal gate construction. We expressed concerns about this to the BSDD and speculated that it was caused by the restoration of Unit 2. We also inquired with ODFW and contacted with Chris Claire. He agreed that mosquitos are likely to breed in non-fish bearing breeding pools, through flooding of non-connected valleys. But he also indicated that it could be explained by the hot summer and the lack of strong summer winds that year.

Since 2019, the mosquitos have been a major issue starting in July of every year. Repeated complaints have not made any difference, and if anything, the mosquito invasions have increased and were of longer duration. Therefore, when learning about the expansion of the CVWA restoration to Units 1 and 3, is it my expectation that the mosquito problem in Garden Valley will become an even greater issue. It is therefore that I urge BSDD and ODFW to include assurances in their proposal to address the mosquito issue heads on in their application.

The lack of addressing the mosquito issue is contrary to the 2016 ODFW's five-year Management Plan of the CVWA that specifically addresses mosquitos and plans to minimize the possibility of increasing mosquito populations. In this Plan¹, it states that "some mosquitoes may respond to the restoration of aquatic habitats on the CVWA.' The same Plan states that "Restoration and management of the CVWA are being planned to minimize the possibility of enhancing mosquito populations." In their Plan, ODFW provides a series of solutions, including enhancing the population of mosquito-attacking fish such as Stickleback and Mosquito fish, after connecting nonflowing waters, so that this fish can prey on the mosquito larvae. If all else fails, ODFW stated to introduce bacteria such as BTI which was successful in controlling mosquitoes at Bandon Marsh. ODFW concluded in this 2016 Plan that "depending on need, ODFW may progressively use more aggressive means to control mosquitos". However, to our knowledge no or little action was taken by ODFW in the past years towards mitigating mosquito populations in the CVWA.

Regarding actions taken by the BSDD, their response has been that their ability to drain the Winter Lake area has been compromised by the faulty tidal gate not allowing to control water drainage when needed. In their responses, they have stated that much improved water level management will be possible after the tidal gate's repair, hopefully this year.

To conclude, I would like for the proposal to include provisions for ODFW to ensure that mosquito mitigating plans are included in the proposal and that such plans will be executed when needed. Moreover, for BSDD to ensure that all lands inundated with tidal water will be connected hydrologically so that mosquito larvae be accessible by fish and other predators.

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¹ Coquille Valley Wildlife Area Management Plan, April 22, 2016. Oregon Department of Fish and Wildlife, 4034 Fairview Industrial Drive SE, Salem, OR 97302