

MAR 03 2010

WATER QUALITY PROGRAM

Jon Jennings- Mosquito Control Permit Comments
Washington State Department of Ecology
Water Quality Program
PO Box 47600
Olympia, WA. 98504

Dear Mr. Jennings:

It is understood that regulations must be reviewed and updated from time to time for the benefit of all. Protecting the environment is a noble cause without doubt. This being said, quality of life and unintended consequences must also be considered.

**AQUATIC MOSQUITO CONTROL
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
STATE WASTE DISCHARGE GENERAL PERMIT**

S 5 A. Adulticides and their residues used for nuisance mosquito control must not be discharged to waters of the state.

As written, this will eliminate the ability of organized Mosquito Control Districts to control the bulk of adult mosquito populations. This will likely have little affect for those living in the larger metro areas. For those of us living in rural areas the effects will be dramatic. I remember the days before we voted in Mosquito Control Districts. Mosquitoes were horrible and I won't willingly return to those times! Larvaciding works very well but it doesn't do the whole job by itself. Integrated pest management utilizing both larvaciding and adulticiding has worked extremely well and should be continued. The products used by the Mosquito Control Districts are very safe. They obey all setbacks and regulations in my experience. They are trained, licensed and conscientious. It is well known that when people don't have professionals to accomplish a necessary task they will do it for themselves. Without proper training people will use whatever they can get their hands on to relieve the problem. Pouring used motor oil over "The swampy areas" was once a common practice used to "Get rid of the bugs". Though one would hope this practice wouldn't be resurrected the overuse or inappropriate use of common over the counter chemicals can also be quite devastating.

Referencing S 5 B Vector Mosquito Control. Subsection 3, Mosquito Control Districts: It makes much more sense to keep the numbers of vectoring mosquitoes very low. If West Nile or another disease is detected having it spread through a smaller number of vectors would be less dangerous. Adulticiding to keep vectors at a minimum would

be the prudent course of action. Once West Nile is found to be present in a large population of vectors the usual response would be large scale spraying from aircraft. This would result in much more adulticide coming into contact with waters of the state than selective spraying from truck mounted applicators in an ongoing process.

In closing I would say I don't want to return to the "Dark ages" because of some bureaucrats in Washington DC or Olympia. The incidental amount of residues from some relatively benign chemicals thought maybe to cause problems pitted against being eaten alive by mosquitoes is no contest. There has been no harm and no fouls by the Mosquito Control Districts. Let them continue to contribute to our quality of life. They must be allowed to do their job as they always have.

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