DEPARTMENT OF ECOLOGY

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WATER QUALITY PROGRAM

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

Dear Mr. Jennings:

The Mosquito Control Permit that is currently being considered must be altered to allow mosquito control to continue spraying adult mosquitoes. I understand that mosquitoes carrying disease pose an immediate threat to public health; however mosquitoes can create a public nuisance so severe that they damage the economy and wellbeing of the citizens. The permit states that "***Adulticides* and their *residues* used for *nuisance mosquito control* must not be discharged to waters of the state."** Mosquitoes live near water, so in order for mosquito control to control the populations they must be permitted to spray over and near waters of the state.

The federal regulations set by the Environmental Protection Agency (EPA) under the guidelines of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) adequately protect the waters of the state from mosquito control products. By imposing additional state restrictions you are unintentionally putting residents' health and welfare at risk. The permit language should read **"Adulticides used for nuisance and vector mosquito control must be applied in a manner consistent with the product labeling. The Permittee is authorized to discharge *incidental* amounts of adulticides and their residues to waters of the state during the mosquito control season."**

The Permit states **"The Permittee may only use Malathion and Naled in case of documented *pyrethroid* resistance development in a specific vector mosquito population."** The additional restriction being placed upon these products is unreasonable. Scientific risk assessments conducted on Malathion and Naled do not support the Department of Ecology's position that these products should only be used in an emergency situation. Pyrethroids not only cost more, but they are less effective in reducing mosquito populations. When a product achieves lower mosquito mortality, additional pesticide is needed to achieve desired control levels. Failure to amend the draft permit could (unintentionally) lead to an increased amount of pesticide being used. Eliminate the additional restrictions on Malathion and Naled.

Mosquito control programs must be allowed to conduct routine practices to control juvenile *and* adult mosquitoes. The permit states that **"A Permittee that is an organized mosquito control district (chapter 17.28 RCW) may use adulticides to control vector mosquitoes provided it: conducts mosquito surveillance, mosquito disease testing, monitors other disease indicators (such as dead birds, equine disease cases, or human health cases) and follows available DOH vector control guidance (e.g. the West Nile Outbreak Response Plan where the trigger for adulticiding is Alert Level 3)."** Alert level 3 requires "Confirmation of mosquito- borne virus in birds, horses, or humans, *or* sustained mosquito borne virus activity in birds and/or mosquitoes." Mosquito control districts will be left waiting for test results rather than taking immediate action to control adult mosquitoes. This delay in response time will lead to unnecessary disease and

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pointless loss of life. Please change the permit wording to read **"A Permittee that is an organized mosquito control district (chapter 17.28 RCW) may use adulticides to control vector and nuisance mosquitoes provided it is part of an Integrated Pest Management program including population monitoring, larval control, biological control methods, and breeding source reduction."**

Mosquito Control Districts are established by a vote of the people under RCW 17.28 and have a responsibility to the public to "take all necessary or proper steps for the extermination of mosquitoes." **We pay for this service with tax dollars because we want to enjoy the outdoors during the summer months and want to keep our animals safe.** Please take these suggestions under careful consideration and allow mosquito control decisions to be made on a local level.

Please consider the animal safety issue!

Sincerely,

Janine DeFord

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