



March 17, 2010

Jon Jennings
Department of Ecology, Water Quality Program
P.O. Box 47600
Olympia, WA 98504

Dear Mr. Jennings:

The Tri-City Regional Chamber of Commerce has some reservations about the Department of Ecology's draft plan to implement a new permitting process for the control of adult mosquitoes near water. Our concern is that the proposed policy will put our residents, businesses and their customers and employees at risk by not allowing Mosquito Districts to adequately control Mosquito populations.

The product label used to control adult mosquitoes states that the products can be used over water to target adult mosquitoes when weather conditions facilitate movement away from the water to minimize incidental deposition. The label restrictions are more than adequate to compensate for possible hazards to aquatic organisms.

The Chamber also has unease on the science the Department of Ecology is relying on in relation to endangering our waterways, particularly salmon and steelhead. Studies show that the products DO NOT harm non-target organisms and have been made available to Ecology and are listed on the permit fact sheet. EPA registered products such as these cause **"no unreasonable harm to human health or the environment."** The fact sheet also states that the products used to spray disease mosquitoes **"do not have reasonable potential to violate water quality standards."** The products used to kill non-disease carrying mosquitoes are exactly the same, yet that type of spraying will be restricted near water.

It is our recommendation that Department of Ecology studies and reviews what comparable state agencies in other parts of the US have enacted in to accommodate and comply with the Clean Water Act before enacting this new rule. We believe there are other processes which would offer sustainable protection to residents of the state without inhibiting proper control and safety while protecting the environment.

Sincerely,


Colin Hastings
Vice President
Tri-City Regional Chamber of Commerce