

From: [Bruce G. Perkins](#)
To: [Jennings, Jonathan \(ECY\)](#)
Subject: RE: Extension of Mosquito Permit Public Comment Period
Date: Wednesday, March 17, 2010 9:36:10 AM
Attachments: [mosquito comments march 12.doc](#)

[Attached are comments from the Benton-Franklin Health District](#)

From: Jennings, Jonathan (ECY) [mailto:joje461@ECY.WA.GOV]
Sent: Friday, February 26, 2010 3:20 PM
To: Henderson, Aaron (DOHi); Brastad, Andy (DOHi); angela@mosquitocontrol.org; Wick, Ann (AGR); Starry, Art (DOHi); Shaver, Audrey (DOHi); Jenkins, Barry (DOHi); Stenson, Brent (DOHi); bwbenner@fcmcd.org; Bruce G. Perkins; Story, Corrine (DOHi); dcouture@co.grant.wa.us; dana@prattpest.com; cmcd@charterinternet.com; Hilton, David (DOHi); Swink, David (DOHi); Riggs, David (DOHi); Riley, Debbie (DOHi); cowmo@cni.net; doug.wangen@lewiscountywa.gov; Dzedzy, Ed (DOHi); Taylor-Eldred, Faith (DOHi); Kelly, Gordon (DOHi); heatherhh@qwestoffice.net; Rivard, James (DOHi); Nelson, Jeff / Grays Harbor (DOHi); info@leavenworthmosquitodistrict.com; Campbell, Jerry (DOHi); Matsuyama, Jim (DOHi); Wolpers, John (DOHi); Brauner, Jo Marie (DOH); Hyde, Jonnie (DOHi); Caballero, Juan (DOHi); Witherspoon, Karen (DOHi); Grellner, Keith (DOHi); Kelly McLain-Aardal; kevinb@klickitatcounty.wa.us; kturemen@co.walla-walla.wa.us; latahtown@aol.com; Dykstra, Elizabeth A (DOH); DnL@pwi.net; Imauren@cityoftacoma.org; Marquis, Marc (DOHi); Tompkins, Mark / San Juan (DOHi); machaelb@co.whitman.wa.us; ngozi.oleru@metrokc.gov; shannon.kelleher@seattle.gov; Marek, Steve (DOHi); Porto, Susan (DOHi); wpctwbug@aol.com; T.JW88@live.com; acmcd@qwestoffice.net; Clifford, Wayne (DOH); Napolilli, Nancy (DOH); Wheeler, Wendy Sue (AGR); Davis, Jennifer L (DFW)
Cc: Weaver, Duane (ECY); Howard, Sandy (ECY); Moore, Bill (ECY)
Subject: Extension of Mosquito Permit Public Comment Period

To parties interested in mosquito control,

Ecology is extending the public comment period by one week to allow more time for comment after the public hearing on March 9, 2010. Written comments must now be received by **5pm on March 17, 2010**. This update is also posted on Ecology's Mosquito Permit website at http://www.ecy.wa.gov/programs/wq/pesticides/final_pesticide_permits/mosquito/mosquito_index.html

Jon Jennings

Aquatic Pesticides and CAFOs

Water Quality Program

Washington State Department of Ecology

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Prevent • Promote • Protect "Always working for a safer and healthier community."

BENTON FRANKLIN HEALTH DISTRICT

7102 W. Okanogan Place • Kennewick, WA 99336 • Phone: (509) 460-4200

March 10, 2010

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

RE: Aquatic Mosquito Permit (NPDES) General
Permit DRAFT

Our office has completed its review of the proposed Aquatic Mosquito Control National Pollutant Discharge Elimination System State Waste Discharge General Permit DRAFT document. Please consider these comments prior to taking action for approval of the current DRAFT document.

APPENDIX A: GLOSSARY-Insert the term "Public Health Threat" along with a definition. The definition should include the conditions specified in the WSDOH document, Alert Level 3, without referencing it as a guidance document. Public Health Threat should be defined to include "Areas with initial confirmations of mosquito borne virus activity in birds, or, a confirmed equine and/or human case, or sustained mosquito borne virus activity in bird, and/or mosquitoes". The most recent year's historical data should be included in these criteria as there are many instances where you have overwintering mosquitoes from the previous year where there is a greater likelihood of earlier vector activity which would need more immediate control.

Page 9-S4-B-2b-i Delete- human health threat and insert "public health threat"

Page 9-S4-D-3c- Delete- mosquito, bird, and animal or human mosquito-borne disease cases are confirmed within the current treatment season and insert to "where a public health threat exists currently or has existed the previous year".

Page 10-S4-D-3e- Delete- the entire item

CA#507

ENVIRONMENTAL HEALTH

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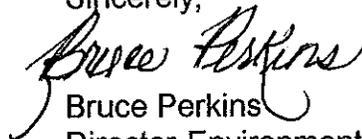
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□ 7102 W. Okanogan Place
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Page 10-S5-B-3 Delete- (such as dead birds, equine disease cases, or human health cases) and follows available DOH vector control guidance (e.g. the West Nile Outbreak Response Plan where the trigger for adulticiding is Alert Level 3 and insert “ and a public health threat exists”

Our office is concerned that the Ecology's permitting process will be so cumbersome as to preclude mosquito control in a timely and effective manner. Time is of the essence in mosquito control, and it's unwise to place so many hurdles on mosquito control that adequate prevention measures are delayed. We encourage Ecology to act in a timely and expeditious manner in developing a permit process that while protecting the environment, will allow for effective mosquito control. If you have any questions, please contact my office.

Sincerely,

A handwritten signature in black ink that reads "Bruce Perkins". The signature is written in a cursive style with a large, sweeping initial "B".

Bruce Perkins
Director-Environmental Health