

March 3, 2010

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

RE: Draft Aquatic Mosquito Control NPDES General Permit/Public Comment

Dear Mr. Jennings

According to the proposed provisions of the Draft Aquatic Mosquito Control NPDES General Permit, there is no provision or authorization for the discharge of any adulticide for "nuisance" mosquito control. It is understood that the decision has been made to disallow the discharge of any adulticide for "nuisance" mosquito control to the state's waters because the "inert/other" ingredients of pesticides are unknown and, therefore, it cannot be determined the effect of those ingredients on the environment. Yet, on the other hand, the same pesticide can be used to control "vector" mosquitoes by balancing the importance of environmental health and human health.

The City of Moses Lake believes that there should be no difference in the consideration for controlling "vector" and "nuisance" mosquitoes. Referring to a mosquito as a "nuisance" mosquito minimizes the affect and impact these pests have or potentially have on the City of Moses Lake's population. A "nuisance" mosquito can become a disease carrying "vector" mosquito quickly. Perhaps a "nuisance" mosquito should be referred to as a "pre-vector" mosquito rather than a "nuisance" mosquito to more correctly identify its status. It is contended that the old adage "an ounce of prevention is worth a pound of cure" applies in this situation. Besides the potential for carrying deadly diseases, "nuisance" mosquitoes can cause a significant amount of discomfort to those they bite and significantly disrupt outdoor activities if left uncontrolled.

If it is deemed permissible to allow an incidental discharge to the state's waters to control "vector" mosquitoes, it should also be deemed permissible to allow the incidental discharge to the state's waters to control "nuisance" mosquitoes for the reasons stated in this letter. If it has been found safe enough to discharge the "inert or other" ingredients in a pesticide to the state's waters to control "vector" mosquitoes, it makes no sense why it would not be safe enough to discharge the "inert or other" ingredients to the states waters to control "nuisance" mosquitoes. The permit should reflect this

permission or allowance.

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The City of Moses Lake, on behalf of its citizens, requests that the Final Aquatic Mosquito Control NPDES General Permit contain language that allows for the incidental discharge to the state's waters of adulticides for the control of both "vector" and "nuisance" mosquitoes.

Very truly yours

Joseph K. Gavinski
City Manager

JKG:jt

cc: Rep. Judy Warnick, 403 John L. O'Brien Building, P. O. Box 40600, Olympia, WA
98504-0600
Rep. Bill Hinkle, 401 John L. O'Brien Building, P. O. Box 40600, Olympia, WA
98504-0600
Senator Janea Holmquist, 106-B Irv Newhouse Building, P. O. box 40413,
Olympia,
WA 98504-0413