From: Benjamin Fredricks
To: Jennings, Jonathan (ECY);
Subject: Mosquito Control Permit Comments
Date: Thursday, March 04, 2010 11:28:00 AM

Benjamin Fredricks, Councilmember
230 Davidson Ave.
PO Box 9
Woodland, WA 98674

March 4, 2010

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; additionally 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 Districts to control these populations they must be permitted to spray 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 mosquito control must be applied in a manner consistent with the product labeling. The Permitee is authorized to discharge incidental amounts of adulticides and their residues to waters of the state during the mosquito control season."***

Mosquito control programs must be allowed to conduct route practices to

control juvenile and adult mosquitoes. The permit states that "***A Permitee 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 testing, 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 pointless loss of life.

Please change the permit wording to read ***"A Permitee that is an organized mosquito control district (chapter 17.28 RCW) may use adulticides to control mosquitoes provided it is part of and 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.

On behalf of my constituents I would please ask that you take these suggestions under careful consideration and allow mosquito control decisions to be made at the local level.

Sincerely,

Benjamin Fredricks
Woodland City Council, Pos. #6

"That government is best which governs least." ~ Thomas Paine

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