

From: retstew@charter.net
To: [Jennings, Jonathan \(ECY\)](#)
Cc: aztec22@aol.com
Subject: mosquito control
Date: Wednesday, March 10, 2010 11:31:37 AM
Attachments: [Mosquito Control DOE 03-2010.doc](#)

Mr. Jennings,

I am attaching a letter to express our concerns about the mosquito control.

Feel free to give me a call at 509-840-9174 if you have any questions.

Thank you in advance.

Mayor Angel Reyna
City of Mabton

City of Mabton
P O Box 655 305 Main Street
Mabton WA 98935

Ph 509-894-4096

FAX 509-894-4813

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March 10, 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 nuisance 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 well being 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 ***The Permittee is authorized to discharge incidental amounts of adulticides and their residues to waters of the state for nuisance and vector mosquito control.***”

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 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 month. Please take these suggestions under careful consideration and allow mosquito control decisions to be made on a local level.

Sincerely,

Mayor Angel Reyna