

From: [Sandy Rock](#)
To: [Jennings, Jonathan \(ECY\)](#)
Subject: comment on NPDES draft permit
Date: Sunday, March 07, 2010 7:56:14 AM
Attachments: [NPDES comment edit-2.docx](#)

Attached (in Word) and below (pasted) please find my comments on proposed changes in the draft NPDES permit:

Jon Jennings
3, 2010

March

Mosquito Control Permit Comments

Washington State Department of Ecology

Water Quality Program

P.O. Box 47600

Olympia, WA 98504
permit

re: Draft NPDES

Dear Mister Jennings:

I urge you to modify the draft permit for water discharges to read, **“The Permittee is authorized to discharge incidental amounts of [mosquito] adulticides and their residues to waters of the state for nuisance and vector mosquito control.”**

In addition to the impact that nuisance mosquitoes have on businesses, tourism and quality of life of those of us who live near Washington state waterways, there is the public health issue. It is well known that mosquitoes harboring West Nile virus (WNV) have been found by Benton County Mosquito Control personnel along this section of the Yakima River in recent years, including 2009. WNV in humans has occurred in Eastern Washington in proximity to waterways with positive mosquito samples. It is of extreme public health importance that any and all preventive measures to reduce likelihood of human cases of WNV be immediately implementable as determined by our excellent local public health and mosquito control officials, and not hindered by state departments’ (Ecology or Health) otherwise well-intentioned attempts to reduce contamination of Washington waterways.

Both the primary and back-up adulticides used for mosquito control are relatively safe for humans and other non-target species. And with appropriate application, they disappear from the environment rapidly. Living right on the Yakima River, I have very little apprehension about health effects from the use of these chemicals to benefit public health and well-being. As an Environmental Health Physician, I have considerable knowledge and understanding about comparative risks of use of chemicals and prevention of human disease from infectious agents. There are always benefits and risks in such matters, and in

this case the benefits of the judicious use of adulticide chemicals to control vector-borne disease (WNV) and maintain quality of life far outweigh the possible environmental or human health effects from the chemicals themselves.

Thank you for your consideration of this recommendation.

Sincerely,

L.B. Rock III MD

L.B. Sandy Rock, MD, MPH

Interpretive Consultations, Inc (509) 942-5405 (425) 260-4051 sandyrock1@gmail.com

563 Tanglewood Dr, Richland, WA 99354

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Sandy Rock
Issaquah and Richland, WA