

**From:** [oneal035](#)  
**To:** [Jennings, Jonathan \(ECY\)](#)  
**Subject:** Mosquito Control Permit Comments  
**Date:** Tuesday, March 16, 2010 8:25:42 AM  
**Attachments:** [oneal035.vcf](#)

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Jonathan,

I am not a Washington state resident, but I am interested in the new permitting legislation proposed by Ecology. I have a degree in forestry and I am a registered environmental health specialist in Minnesota. I have written IPM-based mosquito control plans for counties in Illinois and South Dakota. I just wanted to make a few comments.

To me, there is a difference between an application of mosquito adulticides in places where there is water and the intentional application of other insecticides for other pests. The fact sheet contains a great amount of information, but excludes two important factors: that the application rate for mosquitoes is usually extremely small, with 18-30 microns able to kill a mosquito, versus larger droplets and higher amounts of active ingredients to kill other organisms (I don't know what it takes to kill a tussock moth in a heavily forested area, but I'd be willing to venture its quite a bit more). Following label instructions, watershed protections, and use rates should protect fish populations in water. The other factor is "nuisance" mosquitoes that amplify the amount of disease in reservoir animals, like birds. For example, *Culex pipiens* is the primary vector of West Nile Virus (and others) in Illinois, but high populations of non-human biting *Culex restuans* amplify the disease in birds, then *Cx pipiens* feeds on birds, then transmits the virus to humans. Treating for non-vector species is a typical and responsible approach to vector control.

I believe adulticides should never be excluded from a comprehensive vector control plan, but they should be used carefully and wisely. True, most people will not even know they were infected, or will recover. But for those that do not, it is cold comfort to know that pesticides that are "generally regarded as safe" were available and could have helped limit the spread of these diseases. Pyrethrins and pyrethroids are available on every shelf of every retailer in the United States. It makes no sense to me to limit the ability of responsible and capable mosquito control personnel to control disease-amplifying mosquitoes in order to preserve human life.

Thank you for your time.

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