From: cindy
To: Jennings, Jonathan (ECY);
Subject: Mosquito Control Permit Comments: Mosquito Control Pesticides and the NPDES Permit
Date: Tuesday, March 02, 2010 11:54:18 PM

Dear Sir,

I have grave concerns for the situation about that we as the public may not be protected from mosquito infestation this year due to a delay in a permit allowing our local district to spray. I have young children and horses that live near the Yakima River in Benton City. There are local farmers with irrigation ponds in this area. Without the local mosquito district being allowed to spray for nuisance mosquitoes, my family and animals will be at a very high risk of west nile virus and other blood diseases.

Mosquito Control Pesticides and the NPDES Permit

Please alter the permit to allow the mosquito district to spray.

Please remember:

Most mosquito districts were voted in by the people because nuisance mosquitoes made outdoor activities unbearable. Not spraying for nuisance mosquitoes will have a significant impact on tourism, businesses, and the quality of life of the citizens..

Mosquitoes breed and live near the water. People and animals live and recreate near the water. Mosquito control districts target mosquitoes while they are in the aquatic larval stage, but larvicides are not 100% effective and not all water can be treated. Once mosquitoes become adult flying insects the next step in an Integrated Pest Management Program (IPM) is adult spraying.

If the permit is approved as written, mosquito control programs will not be able to

spray nuisance mosquitoes. When sprays are released from a mosquito truck there is a 300 foot swath width. If no chemical residues are permitted to be discharged into waters of the state, than a 300ft NO SPRAY zone will be placed around all water. It is impossible to adhere to the permit guidelines and effectively control mosquitoes.

Please alter the permit to 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."

I have included background info below.

Mosquito Control
Pesticides and the
NPDES Permit

Background Information: Beginning in 2001, federal courts have ruled that some pesticide applications constitute "pollutant discharges" under the Clean Water Act and therefore require National Pollutant Discharge Elimination System (NPDES) permits. In the State of Washington these permits are under the jurisdiction of the Department of Ecology. Mosquito control products are applied to and near waters of the state; for this reason mosquito control districts must have an NPDES permit to apply pesticides. The Department of Ecology has put together **a draft permit that is open for public comment until 5 pm on March 17, 2010.**

Current Issue: The draft permit includes the following wording, "Adulticides and their residues used for nuisance mosquito control must not be discharged into waters of the state."

Definitions

Nuisance mosquitoes: mosquitoes that are a nuisance to humans and animals bur are not known, in WA state, to be carrying a disease that my be transmitted to humans.

Residues: Any excess pesticide, all chemicals, and their degredants left behind

after a pesticide application.

Waters of the State: All surface and ground waters in Washington State as defined by chapter 90.48.020 RCW and all future amendments of state statute. 90.48.020 reads that "waters of the state" shall be construed to include lakes, rivers, ponds, streams, inland waters, underground waters, salt waters and all other surface waters and watercourses within the jurisdiction of the state of Washington.

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Cindy Wilson

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