State of Washington
DEPARTMENT OF FISH AND WILDLIFE
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Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia, WA

April 17, 2015

Nathan Lubliner
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA98504-7600

Dear Mr. Lubliner:

The Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to review Ecology's proposed revisions to the Mosquito Control General Permit. In keeping with our agency's mission to perpetuate fish and wildlife, we offer the following comments:

1. Inadequate data exist on the ecological effects of pesticide use for WDFW to assure Ecology that the measures proposed in the permit will protect all species, communities, and ecosystems. We recommend robust monitoring of potential ecological effects of all pesticide use and that such monitoring be conducted within an adaptive framework that can effectively inform future applications.
2. We appreciate and support putting the maps of vulnerable areas in a standalone document so that it can be updated as new information is gained. We appreciate and support your efforts to require coordination among permittees and WDFW regarding vulnerable species; we appreciate and support the stepped up notification requirements.
3. Due to concerns of chronic exposure to sensitive marine/estuarine invertebrates, we recommend that you not allow the use methoprene briquettes in tidally influenced areas.
4. We agree with your approach of seeking first to control larval mosquitoes so adulticide use is minimized. Nevertheless, we have concerns about S4.B.4.a which allows preemptive larvicide use on lakes for an entire season based historical trends confirmed by a single positive dip. We would prefer to see more frequent monitoring to confirm mosquito presence to avoid unnecessarily applying pesticides.

WDFW staff are available to discuss these recommendations and comments with you.

Thank you again for your diligent efforts to safeguard Washington's waters, fish, and wildlife.

Sincerely,

Keith Folkerts

CC: J. Henning, T. Quinn, Ph.D., P. Becker, Ph.D., M. Hayes, Ph.D., R. Finger, D. Heimer, L. Hallock