

April 8, 2015

Washington State Department of Ecology
PO Box 47696
Olympia, WA 98504-7696

Dear Mr. Lubliner,

The following are my formal comments on the draft NPDES permit for mosquito control.

S4. Product Use

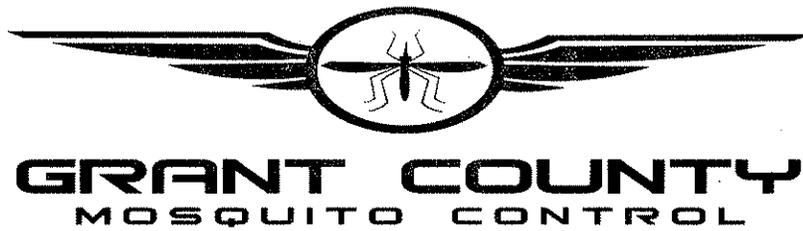
Subsection S4.B Pesticide Application Requirements

Number 4 Larvicides b - states, "Methoprene, Bacillus sphaericus, and Bti based larvicides may be used as a pre-emergent dry-land treatment without dipping in areas that have a historical record of mosquito hatches following flooding." Spinosad has been produced in formulations specifically for the habitat described and should be considered for this section.

Number 6 Vulnerable species – The draft permit requires the mosquito district to create an Integrated Mosquito Management Plan (IMMP) for areas of concern. In Grant County Mosquito Control District #1 (GCMCD) this area is the Northern Leopard Frog (NLF) habitat. We understand the need for an IMMP for that area but find it difficult to complete when no management plan for the NLF has been made available to GCMCD. Also, approval of the IMMP from landowners, WDFW, and DOE is a task that could take years.

A proven scientific way to control mosquito populations is to use a two-pronged approach of larvicides and adulticides. Severely limiting the use of mosquito adulticides goes against sound science and the mission of our district to control the mosquito population for our taxpayers. GCMCD contains approximately 15,000 acres of mosquito breeding habitat, and the NLF is hypothesized to inhabit 5,000 of these acres. Limiting the use of one entire side of our mosquito control operation for such a large proportion of our district is not responsible management. According to the Centers of Disease Control, both nuisance and vector mosquitoes are a public health threat. Since public health is what GCMCD is mandated to protect, utilizing mosquito adulticides is a large portion of completing said task.

In terms of larvicides used in the vulnerable species habitats, to only allow Bacillus sphaericus and Bti based larvicides does not leave many options in a mosquito control district



toolbox. Adding active ingredients such as methoprene and spinosad would greatly improve the amount of control we could achieve when already having to significantly limit the use of mosquito adulticides. Research with methoprene effects on amphibians has been conducted and shown no significant effects on physiology or populations. Also, the use of additional active ingredients for rotation reduces the opportunity for mosquito resistance to *Bacillus sphaericus* and Bti to occur in our local mosquito population.

“Areas of Restricted Larvicide and Adulticide Use Due to Presence of Vulnerable Species” specifically the NLF habitat. In 2014, GCMCD asked WDFW for population studies performed on the NLF, and it became apparent that the actual size of the NLF habitat is significantly smaller than what is listed by township, section, and range in the original NPDES permit. Updating this information would prove to be beneficial to GCMCD so we can continue to conduct responsible mosquito control in the areas where there is no indication of NLF.

S6 Notification and Posting Requirements

S6.A Public notice

Number 3 – “The Permittee must notify wildlife refuges 24 hours in advance of aerial applications of adulticides and larvicides over the refuge.” Ninety nine percent of all of our applications are made using aerial application methods. GCMCD operates aircraft up to 7 days a week depending on the type of application and weather conditions. The majority of our pesticide applications are made on or near wildlife refuges so this requirement would make it impossible to properly notify the refuge. Adding some language to the permit about this not being necessary if the refuge is aware of our spray schedule seems more appropriate. In previous dealings with the wildlife refuge, it is more reasonable for their biologists to contact us if they are going to be in an area of our district conducting wildlife studies. We can therefore modify our application times based on their study requirements.

Thank you for your time and consideration on this matter. If you have any questions or would like to discuss any of these items further I can be reached by phone or email at amoser@gcmcd1.org.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Moser", with a long, sweeping underline.

Ann Belchik-Moser
District Manager