

# Summary of Listening Sessions for the Redevelopment of the Aquatic Mosquito Control General Permit

October 2014

Listening sessions were held by Ecology at three locations around the state in October, 2014. The purpose of the listening sessions was to hear from current Permittees under the Aquatic Mosquito Control General Permit (permit), though the meetings were also open to the general public. Ecology will consider the questions and comments from each listening session as it develops a draft permit.

At each listening session, Ecology provided a brief presentation about potential changes in the next version of the permit. Following the presentation, the meeting was opened to attendees to provide input to Ecology about what is working or not working, needed improvements, and questions about the permit. A formal public comment period and hearing will be held later after Ecology has developed a draft permit.

**NOTE:** For those who are interested, Ecology maintains a ListServ for the aquatic pesticide permits. If you are not a Permittee (who are on a separate mailing list) and want to keep up-to-date on aquatic pesticide permitting activities by Ecology, consider joining the ListServ here: <http://listserv.wa.gov/cgi-bin/wa?AO=ECY-AQUATIC-PESTICIDE-PERMITS>

Listening sessions were held at the following locations:

**Longview:**

October 15<sup>th</sup> 1:00 – 3:00pm  
Cowlitz Regional Conference  
Center  
1900 7<sup>th</sup> Ave  
Longview, WA

**Kennewick:**

October 22<sup>nd</sup> 1:00 – 3:00pm  
Benton PUD Auditorium  
2721 West 10th Avenue  
Kennewick, WA

**Moses Lake:**

October 23<sup>rd</sup> 1:00 – 3:00pm  
Moses Lake Headquarters Fire  
Station  
701 E. Third Ave.  
Moses Lake, WA

The number of participants listed for each session is based on the number of attendees who signed Ecology's sign-in sheets.

**Longview Listening Session Summary (3 participants):**

Attendees at this listening session had a number of questions and some suggestions for updates to the permit.

1. Attendees had questions and comments about the addition of new active ingredients to the next version of the permits. Specifically, when and how new active ingredients can be added to the permit for use by Permittees. Another question was about the

possibility of adding new active ingredients (in general) to the permit during its five year term.

2. One attendee was interested in have the product Zenivex added to the list of allowed products. This is because as a pyrethroid, Zenivex has a unique mode of action. It is formulated with an ether active group, not an ester like other pyrethroids. This allows a change in chemistry when using adulticides to help prevent resistance build up in mosquito populations.
3. Sensitive (e.g. threatened, endangered) species habitat areas were a topic of some discussion. Attendees expressed that it was difficult to control mosquitoes in these areas for two reasons. One is that, under permit, they are limited to using *B. sphaericus* and Bti which do not fully control mosquitoes, and the other is that some land managers (in this case a federal agency) required a separate environmental assessment on every water body in the treatment area where the sensitive species habitat was identified. The example provided was for the Franz Lake National Wildlife Refuge and the work done there to get approval to use Bti to control mosquito populations affecting surrounding areas.
4. Attendees proposed the idea of including more tools (active ingredients) in the list of chemicals allowed to be used within sensitive species habitat areas without WDFW approval. The specific request was for monomolecular surface films (MMSF) due to their effectiveness against mosquitoes in the larval and pupal stages.
5. Another concern that was expressed is how the work being done by EPA and the US Army Corps on better identifying “waters of the US” will affect the permit.
6. There was concern expressed that the next version of the permit would require a reduction in the use of organophosphates (e.g. malathion) for mosquito control.

#### **Kennewick Listening Session Summary (4 participants):**

Attendees at this listening session had a number of questions and some suggestions for updates to the permit.

1. One attendee expressed some concern that not all Permittees have been reporting pounds or gallons of active ingredient on the required annual report and that this may skew pesticide use data.
2. There was concern expressed that all those who should be getting a discharge permit for mosquito control are not and that better education is needed. Specifically, education about who needs a discharge permit and for what activities as well as creating more awareness that adulticiding does need a permit.

3. Working with other agency land managers (e.g. US Army Corps). Requiring consultation before any mosquito control conducted on lands, which usually requires an environmental assessment. Consultation required if federal agency is authorizing control on federal lands
4. Attendees commented on the lack of tools available (active ingredients) in sensitive species habitat areas. There is a want to be able to use the active ingredients methoprene and spinosad in sensitive species areas without having to get approval from WDFW.

Bandon Marsh National Wildlife Refuge was given as an example. The local mosquito control district in Oregon worked with USFWS to get the use of Bti approved for mosquito control in some areas of the Refuge through an environmental assessment. However, this process took an extended amount of time.

5. Another concern that was expressed is how the work being done by EPA and the US Army Corps on better identifying “waters of the US” will affect the permit. And an extension of the question because the permit covers waters of the state (which includes waters of the US), since wetlands are waters of the state, who determines what a wetland is and how a wetlands is delineated?
6. Attendees requested the addition of garlic as an active ingredient to the permit.

#### **Moses Lake Listening Session Summary (10 participants):**

Attendees at this listening session had a number of questions and some suggestions for updates to the permit.

1. The current permit references a guidance document titled “Best Management Practices for Mosquito Control” (ECY Pub No. 03-10-023) issued in 2004. Attendees requested that if this document is still going to be referenced as part of the permit for Permittees to follow, that it be updated.
2. Like at the previous listening sessions, attendees expressed the desire to add methoprene and spinosad to the list of active ingredients allowed for use in sensitive species areas without prior approval from WDFW.
3. Attendees stated that not being able to adulticide in sensitive species areas is a problem, especially in relation to controlling mosquitoes for public health. Larvicides will not completely control a mosquito population so there needs to be some adulticiding allowed when the populations get big enough. Attendees asked if there was a way to streamline the approval process with WDFW or do something like develop thresholds that would allow adulticiding in sensitive species areas.

4. The current permit allows pre-flood (before an area is flooded with water) treatment using Methoprene in areas that are known to become mosquito breeding habitat. Attendees expressed that allowing this greatly helped controlling mosquito populations before they became large and want to keep this provision in the permit.
5. A question was brought forward as to who ultimately makes decision (e.g. Ecology or WDFW) about which products to allow the use of in sensitive species areas.
6. Another question related to allowing the use of products in sensitive species areas was what will it take (e.g. what data) for WDFW to approve use of products in ESA areas?
7. Some attendees expressed the need for Ecology, WDFW, and other partners (e.g. universities, MCD's) to communicate better, and work together to fill in the data gaps present in the information about environmental effects of mosquito control so that better decisions can be made. For example, the state should fund studies to answer the questions about impacts to amphibians so that more informed decisions can be made and so that land managers are less hesitant to make decisions. Also, educate land managers about mosquito control, the use of pesticides, and the risk/benefits of choosing to.