



## Columbia Mosquito Control District

P.O. BOX 297  
912 W. HUMORIST RD  
BURBANK, WASHINGTON 99323  
(509) 547-4994

To Whom It May Concern:

I would like to thank the department of Ecology for the opportunity to comment on the draft of the new NPDES Mosquito General Permit.

Columbia Mosquito Control District has been providing mosquito control services since 1967. For over 40 years we have been dedicated to responsibly improving the quality of life and preventing mosquito related illnesses in our community which covers Burbank, Wallula and surrounding areas. The District accomplishes this by implementing Integrated Pest Management (IPM) strategies designed to utilize cost-effective control measures to reduce mosquito populations and the diseases they potentially carry, while being environmentally sensitive.

Please consider the following comments on the formal NPDES permit for 2019-2024

**IPM:** Every district keeps an IPM plan on file that lays out various steps to be followed in different situations involving larval control, adult control, source reduction, surveillance and public education. Each aspect of the IPM plan needs to be fluid, as situations are always changing. Requiring us to include these in our permit could create roadblocks concerning sudden changes that would be beneficial to everyone. IPM plans may vary greatly from situation to situation. I believe this requirement should be taken out of the new permit as we are already required to keep this plan and it is crucial that it is updated as necessary and expediently as possible.

**Deltamethrin and Resistance Testing:** I believe the restrictions placed on Deltamethrin to prove resistance prior to the use of the product lack reasoning and be unnecessarily burdensome. Deltamethrin is similar to multiple other pyrethroids that do not have this restriction placed on them. According to the manufacturer, this product contains between 20 to 80 times less active ingredient compared to other pyrethroids to achieve the same effect; which is a positive for everyone.

Requiring demonstrated mosquito resistance to use Deltamethrin would put an undue burden on a permittee. Resistance testing is not easily performed and for many districts, ours included, there are no resources available to do resistance training. Also, allowing deltamethrin without this restriction provides permittees another tool to implement in product rotation thereby reducing the development of mosquito resistance.

**No Spray List:** I would like to address the inclusion of a “no spray list” into the new permit. Publishing the procedure for an individual to be added to a no spray list shouldn’t be a requirement from the Dept. of Ecology. Districts receive a list of chemically sensitive people each year from the Washington State Department of Agriculture. That said, a no spray list is something that our district, and most others, maintains as a way to respect chemically sensitive individuals in our communities.

Thank you for the opportunity to provide comments and concerns. I appreciate your time and consideration.

David Ensunsa  
General Manager  
Columbia Mosquito Control District  
Burbank, WA 99323