



STATE OF WASHINGTON

DEPARTMENT OF AGRICULTURE

P.O. Box 42560 • Olympia, Washington 98504-2560 • (360) 902-1800

April 19, 2019

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

Dear Mrs. Callaway,

The Washington State Department of Agriculture (WSDA) would like to submit the following comments to the Department of Ecology (Ecology) regarding its *Formal Draft of the Aquatic Mosquito Control General Permit*:

1. All uses of the organophosphate insecticide temephos have been cancelled by WSDA and the U.S. EPA. As such WSDA feels that it would be appropriate for Ecology to remove temephos from the list of active ingredients authorized for use under special condition 4 (S4) and remove other references to temephos from the permit.
2. WSDA agrees that reporting requirements regarding the use of deltamethrin in response to the development of pesticide resistance within a mosquito population are a valuable addition to the permit. Reporting occurrences of pesticide resistance and the steps taken by permittees to control those populations will provide essential information to ecology and other permittees if pesticide resistance were to develop.

Thank you for providing the opportunity to review the draft permit and provide our comments. Please feel free to call me at (360) 902-2066 or email me at George.Tuttle@agr.wa.gov if you have any questions and I would be happy to talk with you.

Appreciatively,

George R. Tuttle M.S.
Agency Toxicologist
Office of the Director - Natural Resources Assessment Section
Washington State Department of Agriculture