

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. I would also like to thank and point out that this was done a year early to address concerns we brought up with the new active ingredient Deltamethrin. There are however some concerns I have that I feel should be pointed out that I hope you will consider changing or removing from the permit.

First, concerning Deltamethrin, I believe the restrictions placed on Deltamethrin in the regards to proving resistance prior to the use of the product lacks reasoning. Deltamethrin is similar to multiple other pyrethroids that do not have this restriction placed on them. Furthermore 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. I truly believe placing the restriction to use this product only after resistance is not good for mosquito control, the public, the environment or Ecology.

Next I would like to address the part of the permit that covers "take". Mosquito control programs conduct activities to minimize take of non-target species on all our applications especially adult mosquito control or fogging. If there are concerns with significant take of non-targets, which we take great caution to avoid that would be an issue for the department of Ag. I believe this is outside the scope of responsibility of the Department of Ecology and I hope you consider removing this from the new permit.

The next issue involves including IPM plans in the permit application. Every district keeps an IPM plan on file, as required by the NPDES permit 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 tie our hands concerning on the fly changes that would be beneficial to everyone. While I definitely believe strongly that an IPM approach to mosquito control is the right way to go these 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 expedient as possible.

Lastly I would like to address the inclusion of a "no spray list" into the new permit. A no spray list is something that most districts, not all, do as a way to respect chemically sensitive individuals in our communities. Programs receive a list of chemically sensitive people each year from the Department of Ag. Most, if not all districts maintaining such a list tell these people that they will do everything in their power to avoid spray getting into their areas although provide no guarantee as drift can be unpredictable and change rapidly. These districts also generally state that in time of a public health threat or emergency that no spray areas may need to be sprayed for the protection of public health. To require us to include a no spray list opens us up to law suits and also ties our hands in protecting the public.

Respectfully,

Kelly Beehler
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Yakima County Mosquito Control District Manager