

To Whom It May Concern,

April 18, 2019

Please consider the following comments on the formal draft aquatic mosquito control general permit for 2019-2024.

Section S4.B.2.a.i; page 9: Historically, pretreatment surveillance of mosquito breeding sites indicated a need for treatment with a minimum of one larvae/pupae in every three dip samples. The new language raises this requirement to one larvae/pupae in every dip sample. This statement also contradicts what is found on page 40 under “Action Thresholds” as it describes larval counts as being a dip count that shows one larva in three dips.

Section S4.B.3.c; page 10: Requiring demonstrated mosquito resistance to use deltamethrin, would put an undue burden on a permittee. Resistance testing is not easily performed. Allowing deltamethrin without this restriction, provides permittees another tool to implement in product rotation to reduce the development of mosquito resistance.

Section S4.B.4.c.i.B; page 11: A Washington State endangered species, the Northern Leopard Frog (NLF), is located on land owned by the United States Bureau of Reclamation, but the land is managed by Washington State Department of Fish and Wildlife (WDFW). Since the NLF not a federally listed endangered species, the concurrence should only be required from WDFW.

Section S5.B.6.c.i and d.i; page 13: Including the FIFRA label on all the mosquito control products used in a permittee’s IPM plan seems redundant since all labels are easily located either online or at permittee location.

Section S6.A.3.a; page 14: Listing the EPA registration number for each active ingredient in the published public notification would not add pertinent information for the reader, but would add an unnecessary cost increase to the permittee for the publication.

Section S6.A.3.h; page 15: Publishing the procedure for an individual to be added to a “No Spray” list should not be a requirement coming from Department of Ecology. If a person is medically sensitive to pesticides, they should contact Washington State Department of Agriculture (WSDA). Permittees can then obtain that information from WSDA.

Section S6.A.5; page 15: Requiring a 24-hour notification to refuges before aerial applications will create excess work and significant loss of time for Grant County Mosquito Control District No. 1 (GCMCD). The majority of GCMCD pesticide applications are done using aerial application equipment over WDFW managed or owned land. These applications are performed on multiple days every week for the duration of the mosquito season. More reasonable language for this requirement is found on page 15 of the current permit.

Section S7.A.4; page 16: It is unclear as to what type of monitoring requirements this is reference to.

Thank you for your time and consideration.

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District Manager

Grant County Mosquito Control District No. 1