

# Benton County Mosquito Control District

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December 29, 2023

I appreciate the opportunity to comment on the Department of Ecology's (Ecology) Draft Aquatic Mosquito Control General Permit.

Benton County Mosquito Control District (BCMCD) has been providing mosquito control services since 1969. We are dedicated to responsibly improving the quality of life and preventing mosquito-related illnesses in our community which covers Finley, Kennewick, Richland, West Richland, Benton City, Prosser, Grandview, Mabton, and the 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.

S4. A 3. – Comment bringing to your attention to an extra space and comma in this section after WDFW.

S4. B. – Question - Is it required that the Department of Ecology list each pesticide approved for discharge? There are other states, such as Illinois, that do not list the products in the permit. Product choices are tracked by the Pesticide Discharge Management Plans and the annual reports.

Comment - Removing the current list of products, and replacing it with language such as, "Permit coverage includes only products currently registered for use the state of Washington", could reduce the administrative burden on the Department of Ecology.

There are several new products coming to the mosquito control market in an effort to battle pesticide resistance. A couple of these are known, such as pyriproxyfen as a larvicide and ReMOA Tri as an adulticide. The use of these products is likely to be small in comparison to the active ingredients on the list, but it would be a mistake not to acknowledge the possible use of new formulations in a five-year permit. Pesticide resistance is a growing concern in the mosquito control community, especially in 2023 when we saw local transmission of dengue and malaria in areas where these diseases have not occurred for decades. I strongly encourage Ecology to consider opening up the permit to all mosquito control products that are registered for use by the Washington Department of Agriculture, and using the annual reporting requirements and pesticide discharge management plan information to determine if there is a risk to water quality. The process of getting deltamethrin added to the list during the previous permit cycle was a drain on resources.

Current research being conducted by the Centers for Disease Control and Preventions' Regional Centers of Excellence for Vector Borne Diseases shows that pyriproxyfen applied as a larvicide to storm drains can significantly reduce the need to adulticide.

ReMOA Tri is an adulticide with a novel combination of active ingredients. This product was brought to market specifically to combat pesticide resistance in mosquitoes. Washington is one of the few states still working through the details of registration, but we anticipate that will be resolved before the permit is finalized.

The EPA announced in December of 2023 the existence of the Vector Expedited Review Voucher (VERV) program. This is an incentive for companies to find novel mosquito control products for EPA registration.

Best management practices for mosquito control involves surveillance, monitoring and product rotation in order to avoid pesticide resistance. Pesticide registrants are working diligently to provide new tools and pesticide product formulations to combat resistance. If the goal of Ecology is to promote the advancement of science and encourage new tools to prevent resistance, new chemistries should be promoted, not restricted.

Adding restrictions to specific active ingredients in the Aquatic Use Permit creates a public perception that these tools are increasingly toxic to aquatic organisms, contribute more to the environmental load of pesticides, or that they are to be used as a last resort. Benton County Mosquito Control strives to be a good steward of the environment and promotes judicious use of pesticides to protect our residents from mosquito-related illness and nuisance. I'm very concerned about the potential impact of the language in the draft permit relating to resistance management. I believe all tools registered in Washington should be equally available for use by mosquito control programs, should be used in accordance with each program's IPM plan.

Thank you again for the ability to provide written comments on the draft permit. I would like to take this opportunity to express my appreciation to the Department of Ecology staff for sustaining a continuous open dialogue with me and my staff each time we have a permit concern. I hope we can continue to work together to promote public health while conserving the natural resources we all enjoy in Washington state.

Sincerely,

A handwritten signature in black ink, appearing to read "A Beehler". The signature is fluid and cursive, with the first letter of the first name being a large, stylized capital 'A'.

Angela Beehler  
District Manager