

December 21, 2023

Shawn Ultican
WA DOE Aquatic Pesticide Permit Specialist

RE: Public Comment on the Draft Aquatic Mosquito Control General Permit - Redline Version from Grant County Mosquito Control District No. 1 (GCMCD1)

S4.C.1.d –Applicators for mosquito control have a WSDA Public Operator license with a public health endorsement. It would be excessive to have an aquatic endorsement as well. Keeping the current requirement to have either a public health or an aquatic endorsement is sufficient.

S4.C.4.b – If this map is updated periodically, permittees should be notified each time. Also, in investigating the vulnerable habitat within GCMCD1 there appears to be privately owned property that is considered vulnerable habitat that restricts the use of adulticides and larvicides in those areas. That is unreasonable from a mosquito control and public health perspective. This map does not currently depict what has been provided to GCMCD1 from WDFW.

S5.B.4.b – Using ULV techniques to apply adulticides and applying them in the evening, there is a very low likelihood that schools or licensed daycare facilities would be occupied. Mosquito control districts are not provided the locations of schools or licensed day care facilities.

WSDA is not the only entity that has the ability to certify organic farms. Currently, there are 17 entities that certify farms in WA state. According to WSDA, there is not one database that holds the location information of every organic farm in WA. It should be the responsibility of the certified organic producer to contact mosquito control districts on an annual basis to provide farm location. Another alternative is to have language in the permit that permittees are required to map organic farms that are certified by WSDA only.

Mapping stationary apiaries is manageable, but tracking bee hives that move throughout the year is impossible. That information is not provided to mosquito control districts by WSDA or apiarists.

S6.A.5 –Google translate might not be accurate or sufficient enough to get the message across to non-English readers. Can DOE provide a free service to do the translation appropriately?

S7.A.4.d – Requirements for pesticide resistance monitoring S4.B.7 does not exist, so there is no way to know what this is referencing.

S8.A.2.c – License number of pesticide applicator for each application would be challenging to report, especially with over 100,000 acres treated each year in GCMCD1. Reporting the license number of permittee in the annual report is more manageable and reasonable.

S8.A.2.f,g,h, & i – Federal reporting requires the amount of total product applied and the number of acres treated in an area/zone. This is obtainable because some products have multiple active ingredients.

To further clarify, if an applicator applied Vectobac GS (Bti) and VectoMax in an area (Bti and *Bacillus sphaericus*) these products have different EPA numbers so breaking these applications out by active ingredient would be very challenging to document. Our recommendation is to require product applied, acres treated, and EPA registration number in annual reporting, instead of active ingredients.

Appendix C – Mapping (Special Condition S5.B.4); Location of cannabis grow operations: Permittees are not currently provided the location of cannabis grow operations by WSDA or the Liquor and Cannabis Board. These grow operations should be required to contact permittees on an annual basis to provide location and harvest time frame.

The permit currently does not indicate a process to amend the permit for the addition of new active ingredients that get registered in WA state. The EPA is currently backlogged and there are a lot of new active ingredients becoming available for use at any time. To wait until the next permit cycle is undesirable to permittees especially when combating pesticide resistance.

Thank you for your time and consideration.



Ann Belchik-Moser
District Manager
Grant County Mosquito Control District No. 1