



Individuals enhancing the health and quality of life through the suppression of mosquitoes, other vectors and pests of public health importance.



A Partner in the EPA's Pesticide Environmental Stewardship Program

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May 16, 2016

The Honorable Bob Gibbs
US House of Representatives
Washington, DC 20515

Dear Congressman Gibbs:

The American Mosquito Control Association, in concert with mosquito control agencies, programs and regional associations throughout the United States, want to express our enthusiastic support for passage of HR 897 the Zika Vector Control Act clarifying the National Pollutant Discharge Elimination Systems (NPDES) permitting issue facing our public health agencies.

Each year, over one half million people die worldwide from mosquito-transmitted diseases. In the U.S. alone, the costs associated with the treatment of mosquito-borne illness run into the millions of dollars annually.

This amendment addresses a situation that has placed mosquito control activities under substantial legal jeopardy and requires ongoing diversion of taxpayer-supported resources away from their public health mission. Though the NPDES was originally designed to address point source emissions from major industrial polluters such as chemical plants, activist lawsuits have forced US Environmental Protection Agency (EPA) to require such permits even for the application of EPA registered pesticides, including insecticides used for mosquito control. These permits are mandated despite the fact that pesticides are already strictly regulated by the EPA under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA).

Currently, mosquito control programs are vulnerable to lawsuits for simple paperwork violations of the Clean Water Act (CWA) where fines may be up to \$35,000 per day for activities that do not involve harm to the environment. In order to attempt to comply with this potential liability, these governmental agencies must divert scarce resources to CWA monitoring. In some cases, smaller applicators have simply chosen not to engage in vector control activities.

Requiring NPDES permits for the discharges of mosquito control products provides no additional environmental protections beyond those already listed on the pesticide label, yet the regulatory burdens are potentially depriving the general public of the economic and health benefits of mosquito control. This occurs at a time when many regions of the country have seen outbreaks of equine

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encephalitis, West Nile virus, dengue fever and the rapidly spreading new threat of the Zika and chikungunya viruses.

This negative impact on the public health response and needless legal jeopardy requires legislative clarification that the intent of the CWA does not include duplicating FIFRA's responsibilities. HR 897 seeks to achieve that goal and we strongly encourage its passage via any legislative vehicle that enacts its clarifying language into law.

Thank you for your strong leadership on this important public health issue.

Adams County (WA) Mosquito Control District
American Mosquito Control Association
Associated Executives of Mosquito Control Work in New Jersey
Atlantic County Office of Mosquito Control
Baker Valley Vector Control District
Benton County (WA) Mosquito Control District
Columbia Drainage Vector Control District
Davis County (UT) Mosquito Abatement District
Delaware Mosquito Control Section
Florida Mosquito Control Association
Gem County (ID) Mosquito Abatement
Georgia Mosquito Control Association
Idaho Mosquito and Vector Control Association
Jackson County (OR) Vector Control District
Klamath Vector Control District
Louisiana Mosquito Control Association
Magna Mosquito Abatement District
Manatee County (FL) Mosquito Control District
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New Jersey Mosquito Control Association
North Carolina Mosquito & Vector Control Association
North Morrow Vector Control District
Northeast Mosquito Control Association
North Shore Mosquito Abatement District (Cook County, Illinois)
Northwest Mosquito and Vector Control Association
Oregon Mosquito and Vector Control Association
Pennsylvania Vector Control Association
Philip D. Smith
Richmond County (GA) Mosquito Control District
South Salt Lake Valley Mosquito Abatement District
Salt Lake City Mosquito Abatement District
Texas Mosquito Control Association
Teton County (WY) Weed & Pest District
Union County (OR) Vector Control District
Washington County (OR) Mosquito Control

Members of the Mosquito and Vector Control Association of California:

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Alameda County VCSD
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San Diego County Dept. of Environmental Health, Vector Control
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Cc: House Agriculture Committee
House Transportation and Infrastructure Committee

