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Date: 6/9/2008 4:24 PM
Subject: Comments from the MVCAC regarding the draft public review report
"Relative-Risk Evaluation for Pesticides Used in the Central Pesticide Basin Plan
Amendment Project Area"

Comments from the Mosquito and Vector Control Association of California (MVCAC) regarding the draft public review report "Relative-Risk Evaluation for Pesticides Used in the Central Pesticide Basin Plan Amendment Project Area."

To whom it may concern,

This draft report is a component of the Central Valley Pesticide Basin Plan Amendment (CVPBA), the purpose of which is generating the technical information necessary to develop appropriate water quality objectives and policies for "natural water bodies" which are sources to which pesticides are not applied for public health purposes.

Nonetheless, this draft report raises several concerns among the Mosquito and Vector Control Districts (MVCDs) in our state. Seven of the ten mosquito adulticides registered for public health use in California are included on the High (chlorpyrifos, cyfluthrin, deltamethrin, lambda-cyhalothrin, malathion, and permethrin) or Moderate (naled) overall Relative-Risk Level Pesticide lists on pages 21 and 22.

Our main concern is that this report and the Central Valley Pesticide Basin Plan Amendment will lead to restrictions on when, where, and how MVCDs apply these products, which will compromise our ability to protect the public's health.

We would like to have language added to this draft report and all related documents specifically excluding public health pesticide applications from

consideration for the following reasons:

- 1) Mosquito and Vector Control Districts (MVCDs) make targeted applications based on surveillance data that demonstrates the need to do so in order to protect the public's health,
- 2) MVCDs do not apply these materials to "natural water bodies" as defined in the CVPBA*,
- 3) MVCDs' application rates and total materials applied are substantially lower than those used to control agricultural pests,
- 4) All of the public health pesticides used by MVCDs are registered with and approved by the EPA and CalEPA, and
- 5) MVCDs are signatories to a Cooperative Agreement administered by the California Department of Public Health, and are reviewed annually on-site by CDPH personnel. The Cooperative Agreement obligates signatory agencies to certain practices that promote safe and effective vector control and ensures that all state and federal pesticide use requirements are met.

[*"the term 'natural water bodies' refers to flowing surface waters that were originally formed by natural geologic processes" from p. 2 of Responses to Comments on the Scope of a Proposed Basin Plan Amendment for the Control of Pesticide Discharges in the Sacramento and San Joaquin River Basins (http://www.waterboards.ca.gov/centralvalley/water_issues/tmdl/central_valley_projects/central_valley_pesticides/resp_to_scop_com_cvbpa.pdf)

Regarding the methodology of this report:

On p. 6, Section 3.2 Target Pesticide List Creation, excluding pesticides because "aquatic life LC50 or EC50 data are not readily available" or because "chemical and physical properties are not readily available" may overlook many potentially high-risk pesticides. How many pesticides were excluded based on these criteria? Are there other useful criteria that could be used to justify why these pesticides were not considered?

On p. A-70, the comments about naled seem to indicate that it was included specifically because of its public health uses ("Usage: Selected as a target pesticide because of the relatively high application for non-agricultural uses in three counties: Butte (ButteUrban), San Joaquin (SJUrban), and Stanislaus (StanUrban)") even though the agricultural uses were higher than the non-agricultural uses (p. A-71, "Naled was mainly applied on public health use (mosquito's control) for nonagricultural application. Naled was also used for agricultural application, and the annual use for agriculture was higher than the non-agricultural uses."). A brief query of the DPR's PURs for 2003 and 2006 showed that roughly 10% of the amount of Naled applied in CA was for public health pest control uses (data available from <http://calpip.cdpr.ca.gov/cfdocs/calpip/prod/main.cfm>) . Maintaining the availability of Naled is an important part of pesticide resistance management in mosquitoes, and amounts used for public health are negligible relative to the amounts used for agricultural pest control in California.

Also, only 25 of the 29 High Overall Relative-Risk Level Pesticides were included in Appendix A. Chlorpyrifos was among the missing chemicals. What are the reasons for including it in the High Overall Relative-Risk Level Pesticide list?

Thank you for the opportunity to review and comment on this document, and for your consideration of our comments.

Please contact me if you have questions or require more information regarding these comments.

Respectfully submitted,

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Chair, Integrated Pest Management Committee

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