



*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

2017-2018

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The Honorable Ryan Zinke
Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Re: Chlorpyrifos, Diazinon, and Malathion Biological Evaluations transmitted to the US Fish and Wildlife Service on January 18, 2017

Dear Secretary Zinke:

The American Mosquito Control Association (AMCA) requests your assistance in a matter of great importance to our members, particularly those who are involved in trying to control human diseases, such as the Zika virus and West Nile disease. The AMCA is a not-for-profit professional association of approximately 1728 public health officials, academicians, county trustee/commissioners and mosquito control professionals dedicated to providing leadership, information and education leading to the enhancement of health and quality of life through the suppression of mosquito and other vector transmitted diseases and the reduction of annoyance levels caused by mosquitoes and other vectors and pests of public health importance. This is accomplished, in part, through the use of duly registered public health pesticides.

As a public health association with a great interest in the safe and effective use of pesticides, including the organophosphates (OPs) malathion and chlorpyrifos, the AMCA recognizes the risk assessment (RA) process as a critical element in identifying, evaluating, and mitigating potential hazards to humans and the environment from federally registered pesticides. In order that this process best fulfill these crucial tasks, risk assessments must be based upon sound data, realistic assumptions, and verifiable modeling.

At this time, area-wide adult mosquito control can only be performed with two classes of pesticides: OPs and pyrethrin/pyrethroids. To be effective in carrying out their mission, vector control personnel must have multiple products available reflecting a variety of chemistries. This assists in helping to address the range of potential pests and habitats and, equally important, for resistance management. On January 18, 2017, just before the end of the previous Administration, EPA proceeded to finalize and forward to the US Fish and Wildlife Service and the National Marine Fisheries Service, the final BEs for Chlorpyrifos, Malathion and Diazinon. In our opinion, issuing such a significant document in the face of an immediate change in Administration is somewhat inconsistent with historical practices of prior Administrations. Prior to that time, in the development of the BEs, AMCA along with a host of other interested parties submitted

substantial comments on the draft BEs, highlighting a number of critical areas which required further review and revisions. AMCA's comments on the proposed BEs were submitted on June 10, 2016. We would be happy to provide an additional copy to you if needed.

AMCA is concerned that adequate review and consideration of the comments submitted was not accorded the BEs. EPA indicated that it was under some litigation deadline that apparently compelled it to issue the BEs without taking the requisite time and care to objectively review and evaluate the submitted comments and revise the BEs appropriately. However, in our opinion, such an excuse is insufficient to warrant prematurely finalizing the BEs. Because of the very real consequences that will likely flow from subsequent decisions that can be traced back to the BEs, it is essential that the BEs are science based and substantively correct.

AMCA understands that on April 13, 2017, representatives of the registrants of the three active ingredients covered by the BEs sent a detailed letter to you, Administrator Pruitt of the EPA, and Secretary Ross of the Department of Commerce requesting that the BEs to be returned to the EPA for further review, evaluation and where appropriate, revisions. AMCA strongly supports that request. It is vitally important that the BEs be transparent and based on sound science. That is not the case regarding the BEs in their current state. We are providing similar copies of this letter to Administrator Pruitt and Secretary Ross. It is hoped that Administrator Pruitt will take the necessary steps to request that the BEs be returned to his Agency for additional evaluation and that your Department and the Department of Commerce will timely return the BEs to EPA. . Thank you for your assistance with this matter.

Sincerely,

Cc: Mr. Ray Starling, Special Assistant to the President

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