



Friends of Ballona Wetlands

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February 4, 2014

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Comment Letter – Draft Vector Control Permit MRP Amendments

The Friends of Ballona Wetlands (FBW) appreciates this opportunity to comment on amendments to the Vector Control Permit that have been proposed by the State Water Resources Control Board (SWRCB). FBW has been dedicated to protecting and restoring the Ballona Wetlands for over 30 years and was instrumental in protecting the wetlands from development through designation of the wetlands as a State Ecological Reserve. FBW also had a critical role in the design of the Ballona Freshwater Wetlands, a constructed wetland system adjacent to the State Ecological Reserve which has improved the quality of stormwater runoff from surrounding urban development and attracted more than 200 species of birds since construction of the entire system was completed in 2008.

FBW understands the public health issues that motivate actions of the vector control districts; but we believe their use of pesticides has been taken to an unnecessary extreme, which warrants continued chemical testing and monitoring of receiving waters such as Ballona Creek. In most situations, the problem is not acute toxicity or that individual pesticide applications are not in compliance with Federal and State law. The problem instead is that there are cumulative impacts on ecosystems and on the insect populations that form the base of food webs in these ecosystems. These insects include mosquitoes, midges, and larvae of moths and butterflies. According to data provided by the Los Angeles County West Vector Control District in their 2010 Pesticide Use Report, more than 11 tons of pesticides were applied district-wide. With the Greater Los Angeles County Vector Control District applying an additional 9 tons of pesticides, this means that more than 20 tons of pesticides were applied in Los Angeles County alone, in only one year. If these data provide any

indication of the amount of material entering the environment over many decades across California as a whole, it is no wonder that the study conducted by the Mosquito Vector Control Association of California (MVCAC) reportedly found little difference between background and post-application samples collected in 2011 and 2012. We say “reportedly” because we could not find a link to download and review this study, or the Toxicity Study Report, so we cannot comment further on SWRCB’s conclusion that incidence of toxicity from vector control applications is “not significant” (page 2, par. 9), or the conclusion that there is “no significant” impact to beneficial uses of receiving waters (page 3, par. 12).

At the Ballona Wetlands, pesticides are applied throughout the bird nesting season and sprayed onto occupied nest sites. Vector control staff cannot be expected to visually inspect these nests, most of which are hidden from view, to assess the potential for or actual incidences of “distress” or mortality of “non-target” species. High frequency of pesticide use, combined with application methods that arguably conflict with Federal and State laws prohibiting “harassment” of nesting birds, suggest that reliance on visual monitoring and self-reporting on the part of vector control districts, as proposed, is not adequate for resource protection. While regular testing of receiving waters for these pesticides and their breakdown products will not fully address our larger concerns about excessive mosquito abatement practices, or cumulative effects of pesticides after decades of use, such testing and the data it produces remain critical for monitoring water quality and ecosystem health.

Finally, we realize that mosquito-borne diseases such as West Nile virus affect birds. New viruses will undoubtedly appear in the future. But disease resistance will evolve naturally. History has shown us that pesticides are tools that can be overused, resulting in a never-ending battle between mosquito resistance and newer, more powerful chemicals.

We urge the SWRCB to reject the proposed Vector Control Permit MRP Amendments and retain the requirement for chemical testing of receiving waters. We also ask the SWRCB to consider a provision for modifying the list of tests in the future as new vector control pesticides are approved by the EPA and California Department of Pesticide Regulation, and other pesticides become ineffective and are dropped from mosquito abatement programs.

Respectfully,



Edith Read, PhD
Board of Directors, Friends of Ballona Wetlands