



Idaho Mosquito & Vector Control Association

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April 13, 2015

Paula Wilson
Idaho Dept. of Environmental Quality
1410 N. Hilton
Boise, ID 83706

RE: Idaho Mosquito and Vector Control Association Comments on Idaho Pollution Discharge Elimination System (IPDES) draft 4.0

Dear Ms. Wilson:

The Idaho Mosquito and Vector Control Association (IMVCA) is the professional association of mosquito control professionals with members representing mosquito abatement districts, health districts, cities, other local government entities as well as private industry pest management professionals.

There are 23 mosquito abatement districts in Idaho that are under the authority of *Idaho Code Title 39 Health and Safety Chapter 28 Idaho Mosquito and Vermin Act*. Many of these districts were formed shortly after the West Nile Virus outbreak in 2007 that affected over 1000 Idaho citizens causing 21 deaths. Since January 2012, Idaho mosquito abatement districts have been under the authority of the EPA Clean Water Act Pesticide General Permit. All mosquito abatement districts operate under individual NOI's of the EPA General permit. This permit will expire January 2017.

IMVCA appreciates the opportunity to comment on the draft IPDES Negotiated Rule Draft 4.0.

- IMVCA supports the decision of Idaho Dept. of Environmental Quality to adopt by reference the federal rules of the National Pollution Discharge Elimination System (NPDES).
- In reference to Draft Rule 4 Section 130 General Permit, IMVCA urges IDEQ to adopt the rules of the Pesticide General Permit (PGP) as amended October 31, 2011
 - Section 2.2 Mosquitoes and Other Flying Insect Pest Control.
 - Section 3-Section 6 as outlined in the NPDES PGP.

Respectfully submitted,

Ed Burnett
President Idaho Mosquito and Vector Control Association