

From: James Lunders
Sent: Monday, April 01, 2013 2:38 PM
To: Sen Dingfelder; Sen Olsen; Sen Bates; Sen Hansell; Sen Hass
Cc: Lutman Jennifer
Subject: Oppose SB 800

Dear Senators,

I am writing urging you to oppose SB 800. SB 800 will negatively impact Vector Control Districts ability to effectively control mosquitoes and vector borne diseases by forcing them to spend limited time and resources filing duplicative paperwork. Vector Control Districts are already required to maintain this information on file for review by EPA, DEQ, or ODA if they request it. Also beginning in 2012 Districts are required to submit an annual report to DEQ of all pesticide applications made to Waters of the State in accordance with NPDES Permit requirements.

It is unlikely that DEQ could effectively handle the workload or financial burden of implementation of this bill. Oregon failed attempt to implement the Pesticide Use Reporting System (PURS) several years ago clearly demonstrates that. Not only was PURS an epic failure it was not nearly as far reaching as this bill, as it only required summaries of applications, not a complete list of individual applications.

This bill would also negatively impact DEQ by shifting significant pesticide responsibilities from ODA to DEQ. This additional responsibility will either require DEQ to need increased funding or take away resources intended to protect the environment to manage a database of pesticide applications that is already being maintained by the individual pesticide applicators.

The ODA has an entire division devoted to regulation of pesticides. DEQ clearly doesn't have the needed expertise in pesticides to administer a program such as this. Even under the NPDES permit imposed last year DEQ has stated that they will use ODA's pesticide investigators in the event of a possible illegal pesticide application.

As the Manager & Biologist of the Jackson County Vector Control District and the North Pacific Director of the American Mosquito Control Association I am tasked with protecting the public from the negative impacts of mosquitoes, other vectors, and the diseases they carry. I urge you to OPPOSE SB 800 so that we can continue to protect public health.

Thank you,

James J. Lunders, Manager & Biologist
Jackson County Vector Control District
North Pacific Director, American Mosquito Control Association
555 Mosquito Lane
Central Point, OR 97502
(541) 779-6460
vector@jeffnet.org