

Mosquito Control Task Force Listening Session #2
Summary of Oral Comments
February 10, 2022; 4:00-6:00pm

The purpose of the listening session was to accept public comment on the Mosquito Control for the Twenty-First Century Task Force subcommittee draft recommendations for comprehensive reform of the commonwealth's mosquito control system. This session was held remotely and was recorded for distribution to task force members and to post on the task force webpage.

Attendees signed up to speak at the listening session and were called on in the order in which they signed up. It was requested that comments be limited to three minutes. Attendees who signed up to speak but were not immediately present were given a second opportunity. Written comments pertaining to this session were accepted through February 14, 2022, at 5:00 p.m.

The listening session commenced at 4:00pm. The Executive Office of Energy and Environmental Affairs Undersecretary of Environmental Policy and Climate Resilience and Chair of the Mosquito Control for the Twenty-First Century Task Force, Bethany Card, provided an introduction, presented a series of background slides and guidelines for the session, and then opened the public comment period at 4:08pm.

The Mosquito Control for the Twenty-First Century Task Force received oral comments from 30 separate individuals. There were 235 attendees (est.) in the session, including task force members and Commonwealth of MA employees.

The listening session concluded at 6:00pm.

Summary of Oral Comments

The following notes summarize oral comments provided by listening session participants.

- Pesticide use in mosquito control: several commenters expressed concern over use of pesticides in mosquito control
 - General
 - Commenter requested limiting the use of pesticides whenever possible
 - Comment that indication of pesticide safety by pesticide manufacturers does not mean that pesticides are safe
 - Comment expressing frustration that local pesticide spraying activities do not take place with enough notice or outreach to community residents
 - Commenter expressed concern that recommendations come from a pro-pesticide viewpoint. Commenter indicated that the recommendations do not use the term “organic” and that chemically synthetic pesticides should not be a component of the mosquito control program
 - Commenter expressed concern over use of pesticides in the outer Cape Area, and its impact on businesses and health
 - Private application of pesticides: three commenters expressed concern over private application of pesticides and private applicators’ use of pesticides, with requests that this issue be reviewed and addressed by the task force
 - Comment that private mosquito spraying should be tightly regulated and that the task force should explore closing loopholes about frequency of private spraying on properties
 - Support for creation of online reporting system to view data on private applicators, for analysis in order to understand the problems and to make recommendations to improve private interventions
 - General interest in more oversight over private application of pesticides
 - Preventative measures: multiple comments expressed interest in preventative efforts vs. reactive efforts like spraying to control mosquito populations
 - Encouragement for treatment as early in mosquito life cycles as possible
 - Call to focus on prevention of mosquitoes vs. killing of mosquitoes
 - Efficacy: comments noted importance of efficacy assessment and implementation of mosquito control measures that prioritize efficacy
 - Commenter noted a need to conduct tests before and after spray events
 - Commenter noted that mosquito control programs should do a better job of specifically targeting mosquitoes with the viruses that cause public health issues
 - Multiple comments called for establishment of thresholds for spraying, informed by efficacy measures
 - PFAS: Comments urged strong action against products containing PFAS and increased oversight efforts
 - Spraying of pesticides: several comments indicated strong opposition to aerial spraying and general opposition to localized spraying
 - Several comments strongly supported prohibition of aerial spraying

- One commenter indicated that although they don't have a certified organic farm, an aerial spraying application would eliminate their ability to sell their produce as organic
- Commenter requested no broad spraying of pesticides
- Commenter noted that spraying pesticides should be used as a last resort, and the decision should be based on an elevated disease risk and not nuisance control
- Comment that truck-based application of pesticides should never be conducted due to everything beyond mosquitoes that come into contact with the applied pesticides
- Comment that there are a lot of dense wetlands that harbor mosquito populations across the state, and spraying cannot penetrate the wetlands, which renders spraying not effective
- Comment that the existing mosquito spraying program is in direct opposition to other state programs that aim to protect ecology
- Comment indicating frustration that new residents of municipalities are allowed to log complaints that might result in spraying that affects others
- Comment requesting to avoid blanket statements on ceasing use of airplane application of pesticides, with reasoning that a targeted aircraft application is necessary to reduce the mosquito population and might also reduce the need for additional ground-based application
- Human health and ecological health
 - Commenter noted that protecting non-target species from pesticide application is critical
 - Comment that climate change is prompting a decline in backyard bird populations, a decline in monarch butterflies, and a decline in pollinating insects, and that pesticide use for mosquito control is significantly impacting these same populations
 - Commenter indicated that although property was excluded from the last MCD spray event, the individual still noticed the loss of bees in their yard
 - Commenter requested that task force recommendations reflect potential risk of exposure to pesticides on health
 - Commenter called on task force to consider risk/benefit profile of mosquito borne illness vs. widespread impact of pesticide use. Commenter's perspective was that the human risk of contracting mosquito-borne illness (EEE/WNV) is very low as compared to the harm caused by widespread pesticide use
 - Commenters called on task force to focus on public health and not on human comfort, and called on the task force to distinguish between nuisance versus disease mosquito management
 - Commenter indicated that mosquito management needs to move away from chemical controls and towards ecological methods
 - Pollinators: multiple comments expressed interest in eliminating or minimizing use of pesticides, in support of pollinators

- Three commenters expressed concern over well-being of all pollinators in MA and throughout the country, including native pollinators
 - Comment requesting that beekeepers who sell honey should have their bee yards exempted from spraying
 - Comment that pesticides that are least toxic to pollinators should be used
 - Comment that pesticides are contributing to decline in pollinators across the country
 - Comment that we should restrain from interactions that kill mosquitoes because large ecosystems that include pollinators take a lot of time to resettle
 - Comment that bee hives should be monitored before, during, and after truck-based spraying to assess impacts
- Vulnerable populations: multiple comments expressed concern over impact of pesticide use on vulnerable populations
 - Commenter discussed first responders and others that have been chemically injured and marginalized and requested that the task force give additional focus to these populations and requested that task force view NOFA's presentation on the topic
 - Commenter identified that there are published studies that correlate impact of pesticide exposure to exacerbated health effects to the chemically sensitive community (will share links in written comments); noted that chemically sensitive community is substantive and has been increasing
 - Call for task force members to pay attention to the impacts of pesticides on vulnerable populations, because even low-level exposure to pesticides can be harmful, and there are a lot of health issues that could be exacerbated by mosquito control chemicals
 - Commenter described multiple pesticide poisoning experiences, and called on task force to consider experiences of individuals like commenter that endure impacts
 - Call for the task force to consider more balanced perspectives on impacts to vulnerable populations, because there are studies to support perspectives that are not currently being utilized in task force decision making
- Ecological mosquito control efforts
 - Several commenters expressed general support for ecological approach to management of mosquitoes
 - Call on mosquito control programming to shift away from chemical management to ecological management structure that prioritizes use of preventative measures
 - Commenter indicated cautious optimism with the recommendations as framed now

- Comment supporting expansion of ecological efforts to solve problems in an environmentally friendly way
 - Comment that mosquito control practices should first account for the local environment
 - Two commenters indicated evidence that application of garlic oil on their properties has worked in mosquito prevention
 - Request for mosquito control applications that are favorable to honeybees
 - Commenter suggested planting gardens to support increased pollinator populations
 - Comment that mosquitoes are not a problem and that natural systems should be able to effectively control the populations; noted that mosquitoes are a food source
 - Support for low impact development techniques to reduce flooding potential, that leads to standing water
 - Multiple comments supporting reduction of standing water, including implementation of the runnelling technique to reduce standing water as a means of limiting coastal salt marsh mosquito habitat, and support for ditch remediation because it is low technology, low impact, and low risk
- Local Engagement/Education: several comments called for more communication and better communication with local residents
 - Commenters indicated concern over existing public notification systems (particularly for spraying) as being not consistent enough or predictable enough for residents – especially for beekeepers
 - Comment that local engagement is important to educate residents and in order to improve implementation of new systems
 - Call on task force to support development of creative ways to engage the public
 - Support development of tools for municipalities to use to educate community as to how to reduce mosquito populations
 - Comment that local engagement should include outreach to the media, in order for the media to provide good science-based information to the public
- Policy Structure
 - Multiple comments expressed support for repeal and replace of M.G.L. 252, including a replacement of the SRB, and restructured oversight board
 - Included a call for additional experts on the board
 - Included a call for inclusion of independent experts on the new oversight board
 - Multiple comments indicated concern that proposed policy structure would eliminate or minimize local control of mosquito control, and that this was not an acceptable outcome
 - Commenter noted that different parts of the state’s mosquito control organizations operate very differently and should continue to conduct mosquito control based on local wants and needs
 - Commenter noted that other public comments implied that more statewide control was the best mechanism in which to increase ecological mosquito control mechanisms, and strongly disagreed with the notion that more statewide control would result in that outcome

- Commenter indicated that if funding is sourced from municipalities, that the local mosquito control organizations should be the decision makers for use of those funds
- Commenter called on task force to consider mechanisms to improve the regulatory structure for projects that focus on preventative management of mosquitoes, including installation of runnels and restoration of tidal hydrogeology
 - Request to remove regulatory hurdles to make permitting process easier
- Baseline services and menu-based approach
 - Multiple comments indicated support for provision of baseline mosquito control services to all municipalities, including monitoring and education and other ecological-based mechanisms
 - Multiple comments indicated support for a menu-based approach that prioritizes community choice
 - One commenter indicated that this approach may promote more participation in MCD processes
 - Support for residential opt-out of services
- Mosquito Management Plan: multiple comments indicated that that the development of a statewide mosquito management plan will allow for consistency in administration and allow for implementation of efficacy measures
- Integrated Pest Management: multiple comments indicated support for IPM strategy under discussion by the task force
- Utilization of science-based resources to inform recommendations: commenter discussed lack of mosquito control experts participating in discussion and recommended that task force reach out to CDC to review CDC-published materials on mosquito control, and suggested the task force look at the American Mosquito Control Association documents and best management practices when developing IPM procedures
- Agriculture: commenter expressed concern about the narrowness of the definition of organic agriculture with regard to mosquito control, and noted there are many small farms that would benefit from the same permissions and protected status option, as certified organic farms. Commenter recommended that the task force find a way to widen the definition to include the small farms that don't have the resources to become certified
- Mosquito spraying opt-out
 - Program to enable municipalities to opt-out of SRMCB mosquito control spraying for 2022
 - Request for setting a reasonable deadline so that municipalities have time to prepare for approval by Local Boards of Health and Select Boards
 - Concern that towns don't have the time or funding or resources to go through a lengthy process by which to opt-out, and noted that the state must account for the costs of the process
 - Three commenters described experience going through opt-out process last year – expressed frustration that towns were denied based upon regional risk levels because some towns are geographically different than in the location in which infected mosquitoes are found, and felt that opt-out applications were justified enough to warrant approval
 - Mosquito spraying opt-out into the future

- Commenters expressed interest in maintaining local option for opt-out
 - Ability to opt out is very important and that municipalities need to be able to make independent decisions
 - Support for development of online system to track opt-outs
- Support for existing mosquito control efforts
 - Multiple comments expressed appreciation for Cape Cod Mosquito Control Project (CCMCP) in managing mosquito populations
 - Comment that CCMCP has worked well with local entities to respond to infestations in order to put good practices to use, particularly when individual control efforts like repellent were not sufficient to those partaking in the outdoors
 - Comment that CCMCP has done a great job with ditch clean-out
 - Comment that CCMCP is responsive and responsible and locally supported and controlled, particularly in implementation of best management practices
 - Multiple comments expressed appreciation for cooperation between Bristol County Mosquito Control District and local organizations – particularly to commend successful project to construct runnels for management of standing water, and to commend staff for great work and willingness to share learned practices with other MCDs
- Other/Misc.
 - Commenter indicated that draft recommendations are moving in the right direction
 - Support for the work of the task force and the work that has been proposed
 - Comment that many of the comments made in this listening session are similar to comments from the many in the first listening session, and that many of these concerns are being ignored by the task force
 - Comment that cautioned about oversimplification of the recommendations as presented during the listening session, and prompted listening session attendees to read the detailed draft recommendations
 - Commenter suggested that task force members listen to the legislative briefing that was given on 1/26
 - Support for wider use of personal protective measures
 - Call for inclusion of organic farmers, beekeepers, or the chemically injured on the task force and in task force dialogue
 - Call for implementation of innovative partnerships with local land trusts/town on synergistic projects to improve ecological health and reduce mosquito breeding habitat

List of Individuals Providing Oral Comments

Note: Information included below is self-identified by the registrant

First and Last Name	Job Title and Organization	Affiliation	Subcommittee to which comments pertain
Patti Page	Mortillaro Lobster - Industry Liaison	Business	Local Engagement;Policy Structure;Pesticide Selection;Best Practices;
Barry McLaughlin	General Manager	Business	Best Practices;Pesticide Selection;Policy Structure;Local Engagement;
Sharon Dunn	writer	Private Citizen	Local Engagement;
Louise Hetzler	Self-employed music teacher	Private Citizen	Best Practices;
David Brown	Technical Advisor American Mosquito Control Association	NGO/Community Group/Non-profit	Best Practices;
Skip Del Vaglio	Old Drone Apiary at Frog Cottage Master Beekeeper	Private Citizen	Pesticide Selection;
Mary Duane	President Massachusetts Beekeepers association	Private Citizen	Best Practices;
Heidi Dollard		NGO/Community Group/Non-profit	Best Practices;
Jean Lemieux	President of the Massachusetts Association for the Chemically Injured	NGO/Community Group/Non-profit	Best Practices;Local Engagement;
Drew Toher	Beyond Pesticides	NGO/Community Group/Non-profit	Local Engagement;Best Practices;Pesticide Selection;Policy Structure;
Gayle Fee	President, Board of Governors, Chequessett Club, Wellfleet	Business	Local Engagement;
Marcella Stasa		Not listed or N/A	Best Practices;Pesticide Selection;Policy Structure;Local Engagement;
Nancy Rea		Private Citizen	Best Practices;Pesticide Selection;Policy Structure;Local Engagement;
Cathy Kristofferson	Conservation Commission member	Government	Best Practices;
Roberta Flashman	Ashby Conservation Commission - Commissioner	Agriculture	Best Practices;
Dorothy McGlincy	Executive Director, Massachusetts Association of Conservation Commissions	NGO/Community Group/Non-profit	Best Practices;Pesticide Selection;Policy Structure;Local Engagement;
Kym Doherty		Private Citizen	Best Practices;Pesticide Selection;
Michael Farley		Private Citizen	Best Practices;Local Engagement;Pesticide Selection;

Ellen Fine	Director, Community Equitability Group- Resiliency Gardens Project Healthy Yards, Needham	NGO/Community Group/Non-profit	Best Practices;Local Engagement;Pesticide Selection;Policy Structure;
J. Gregory Milne	Chairman -- Board of Commissioners -- Cape Cod Mosquito Control Project	MCD	Best Practices;Policy Structure;Local Engagement;Pesticide Selection;
Lisa Rigsby	Resident	Private Citizen	Best Practices;Pesticide Selection;Policy Structure;Local Engagement;
Rachel Jakuba	Vice President for Bay Science, Buzzards Bay Coalition	NGO/Community Group/Non-profit	Best Practices;Local Engagement;
Charles Sumner	Interim Town Administrator Town of Wellfleet	Government	Policy Structure;Local Engagement;
Kevin Robbins		Private Citizen	Best Practices;
Chris Doyle		Private Citizen	Best Practices;Policy Structure;
Wenley Ferguson	Director of Habitat Restoration	NGO/Community Group/Non-profit	Best Practices;
Victoria Antonino		Private Citizen	Best Practices;Local Engagement;Policy Structure;
Gillian Budine	Town of Wendell, Selectboard member	Government	Policy Structure;Local Engagement;Best Practices;
Jeanne Mooney		Private Citizen	Local Engagement;
Danielle Perry	Coastal Resilience Program Director and Mass Audubon	NGO/Community Group/Non-profit	Best Practices;