



# Interior Health

## **Pest Management Plan for the Control of Mosquito Larvae That Are Potential Vectors of West Nile Virus**

## **Summary of the Public Consultation Process**

**For:**

**PMP Application #: IHA-WNV-(L)-2009**

**April 6, 2009**

## 1.0 Public Consultations

Public consultations were conducted in compliance with Section 61(1) of the BC Integrated Pest Management Regulations (IPMR). Apart from meeting this legislative requirement, the objectives of conducting these consultations were:

- To increase public awareness of the PMP process and of the principles of Integrated Pest Management which are embodied in the PMP;
- To ensure that the public have an opportunity to identify concerns, and for the plan holder(s) to address those concerns before the PMP is finalized and a Pesticide Use Notice submitted for confirmation;
- To ensure a transparent and accountable review process for the PMP;
- To educate the public on the need to control the larval stage of those mosquito species that are known or potential vectors of West Nile Virus (WNV); and,
- To explain how the planning process that is described in the PMP recognizes the need to protect human health and the environment.

The public was consulted on the PMP development via notices in local community newspapers within combined circulation throughout the geographic boundaries of the plan. Two notices were published within a 2 week period in each newspaper within the geographic boundaries of the plan. Notices were published between February 18, 2009 and March 4, 2009. The list of newspaper (and their circulation/distribution area) in which advertisements were being proposed for insertion, and the specific wording in the advertisements, were discussed with, and approved by, Ministry of Environment, Penticton, prior to the public consultation process being initiated. As shown in the following table, the published notices were in compliance with content requirements as specified in Section 61(1) of the IPMR:

<b>Newspaper</b>	<b>Publication Dates</b>
Oliver Chronicle	February 25, 2009 and March 4, 2009
Osoyoos Times	February 25, 2009 and March 4, 2009
Grand Forks Gazette	February 25, 2009 and March 4, 2009
Trail Daily Times	February 18, 2009 and February 19, 2009
Nelson Daily News	February 18, 2009 and February 19, 2009
Similkameen News Leader	February 24, 2009 and March 3, 2009
Penticton Herald	February 18, 2009 and February 21, 2009
Kelowna Daily Courier	February 18, 2009 and February 21, 2009
Vernon Daily Courier	February 18, 2009 and February 21, 2009
Arrow Lakes News	February 25, 2009 and March 4, 2009
Kootenay News Advertiser	February 20, 2009 and February 23, 2009

During the public consultation process, the draft PMP was accessible to the public in various locations, as stated in the public notifications, and on the IHA website to allow the public to view and download the PMP.

<http://www.interiorhealth.ca/health-and-safety.aspx?id=450>

A copy of the tear sheets for each of the published notices can be found in Appendix 1 of this report.

## 1.1 Responses to Public Consultation

The responses to public consultations were in the form of verbal (telephone) correspondence, written communications and e-mails.

### 1.1.1 Chronological Summary of All Communications Received in Response to the Newspaper Advertisements

Date and Location	Summary of Communication
Feb 20 <sup>th</sup> (telephone call) Trail	Concerned about pesticide use and creek, stream and drinking water contamination on the large areas of standing water on his 66 acres. He is part of a larger community group that is opposed to pesticides. I advised that the PMP being proposed is a replacement for a permit that has been in effect for several years, and that the CKRD already has a PMP in place for the same purpose as this one. The intent of this PMP is to provide the legal means to control WNV vector mosquitoes in areas where existing PMPs are not in place. I told him that the IHA have developed the PMP as a preventative measure against WNV. All larviciding would be done at the local government level using funds from MoH and administered by UBCM. The PMP would only be used if WNV became a threat in his area, and then only by the local governments. I also mentioned that the products being proposed for use were not traditional pesticides, such as the herbicides being used by FortisBC in his area, which he is very opposed to. I explained their specificity and low toxicity. I invited him to read the draft PMP and, if he has further questions, to contact me further. He seemed reassured by my answers.
Feb 20 <sup>th</sup> (telephone calls) Cranbrook	In order to respond to enquiries about why this PMP is required, it was necessary to contact both these regional districts to determine in what areas their mosquito control PMP covers and to obtain a copy of their PMPs. This is because the intent of this PMP is to provide the legal means to control WNV vector mosquitoes in areas where existing PMPs are not in place. It was confirmed that the EKRD PMP only covers the communities of Wasa, Ta Ta Creek and Skookumchuck, and the CKRD only covers in and around the City of Nelson
Feb 25 <sup>th</sup> (telephone call) Crawford Bay	Thought that SMC Consulting was going to be doing the spraying, and that the IHA would be doing larviciding without consulting or involving local governments. Also concerned with pesticide use in general (commented about her battle with FortisBC over their ROW herbicide treatments last year). I assured her that SMC Consulting's role was only to prepare the PMP and facilitate the public and First Nation consultation process. I also assured her that the PMP, was intended to be used voluntarily by local governments, First Nations and agencies upon application to be agents under the plan, and that the choice of larviciding under the PMP would be at the local government level only. I explained the nature of the products being proposed for use, particularly that Bti products are allowed for use by certified organic producers. I also mentioned that the products being proposed for use were not traditional pesticides, such as the herbicides being used by FortisBC in his area,

	which she is very opposed to. I invited her to read the draft PMP and, if she has further questions, to contact me further. She seemed reassured by my answers.
March 5 <sup>th</sup> (telephone calls) Nakusp	Was concerned about larviciding in and around Nakusp, where there are no mosquitoes. I explained that the PMP was primarily designed for use by local governments in areas where there are no existing plans. Currently, there are no plans to undertake larviciding in the Nakusp area as there is a reduced threat in this part of the Kootenays from WNV attack. I explained that the decision to larvicide was going to be at the local government level, with funding given by IHA through UBCM. I also explained the nature of the products being proposed for use, particularly that Bti products are allowed for use by certified organic producers. I invited her to read the draft PMP and, if she has further questions, to contact me further. She seemed reassured by my answers.
March 5 <sup>th</sup> (telephone call) Kimberley	Called to enquire if the IHA PMP was going to replace the City of Kimberley's existing PMP for nuisance mosquito control, and that if they did not use the IHA PMP, would they lose their funding from UBCM. I explained that the intent of the IHA PMP was primarily to provide the legal means for jurisdictions not currently working under a PMP to do larviciding, and that their funding from the UBCM was not dependant on which PMP they worked under. He was reassured by my answers.
March 6 <sup>th</sup> (telephone call) Penticton	Concerned that the IHA PMP duplicated the plan already in place and held by the RDOS. I explained that the IHA PMP was primarily designed for use by local governments in areas where there are no existing plans. She has no concerns about the products being proposed for use, as she has previously worked for DG Reagan and Associates in the Penticton and Grand Forks areas doing mosquito larviciding.
March 9 <sup>th</sup> (telephone call) Nakusp	Concerned about the use of pesticides on bees and other animals that feed on mosquitoes (mainly adult mosquitoes). Has no access to a computer and has not read the PMP. She stated that she would rather see human cases of human WNV than have us poison mosquitoes. I explained that the Bti products proposed for use are sanctioned for Certified Organic grower use. She maintained that all pesticides are the same. I stated that there were no plans to even use the PMP until WNV had been confirmed in an area, and then it would be done at the local level through funding provided through the UBCM. I mailed a copy of the draft PMP to her, and asked her to contact me again if she had further questions
Letter received March 15, 2009 Grand Forks	In favour of the PMP. His main question was whether the IHA PMP would replace or supplement the current Grand Forks PMP. He would like to see larviciding expanded. Letter responded to by e-mail on March 16, 2009.
March 18, 2009 (telephone call) Winlaw	Belongs to the Kootenay Ecosociety. Wanted information on the products being proposed for use. Had not seen the PMP. I summarized the intent of the PMP and about the products being proposed. Noted that all products except methoprene can be used by certified organic growers., and that methoprene use was not contemplated in the Kootenays. I sent her an e-mail giving her the link to the PMP on the IHA web site, the Organic Standard web site, and the CKRD PMP link. She seemed happy with my responses
Received by IHA on March 18, 2009 Location Unknown	Petition signed by 37 residents of the Central Kootenay. Petition stated "This plan has been proposed to control potential vectors of WNV by water management and spraying of pesticides from helicopter and fixed wing aircraft. This will affect the quality of all forms of life including plant, water and animal. Mosquitoes aren't the problem. How many cases of WNV have you heard of in this province? Only one case affecting a human and that was probably due to travel outside the province. If you are not willing to compromise our pristine environment and the health and safety of our wildlife, please sign below"
E-mail on March	Would like to get a map of Nakusp BC and Area K that will or may be treated, and

<p>19, 2009 Nakusp</p>	<p>would also like to know what kind of treatment will be used to treat the areas, and, will the treatment have any other environmental risks. There are many concerned residents in Nakusp and Area K, so this is why we would like more information on the Pest Management Plan. If possible could you please keep us updated. Responded by letter March 20<sup>th</sup>, 2009. Explained that there were no plans for treatment unless WNV was confirmed in the area. Also, that it was very unlikely that treatments would occur in the Nakusp area, as there has not been a problem in this area historically with mosquitoes. Decisions on treatment would be made at the local government level. She responded on March 21<sup>st</sup>, was reassured by the response, and promised to have my response letter put on the agenda at the March 24<sup>th</sup>, 2009 Council meeting.</p>
<p>E-mail on March 19, 2009 Nelson</p>	<p>Mainly concerned about adulticiding use, methoprene use and protection of drinking water sources. Responded by letter on March 19, 2009. Response letter indicated: 1. I have confirmed that the IHA has no plans to undertake adult mosquito control at this time. To do so would require working under a PMP, which they have not got, and have no plans to develop one. 2. It is unlikely that methoprene products would ever be used for larval mosquito control in the Kootenays. The use of methoprene is restricted to applications into catch basins only. To my knowledge, the only area of the province where methoprene has been used historically is in the lower mainland (i.e. the GVRD). I will bring your concern on methoprene use to the attention of the IHA. 3. I do understand your reference to the term "treated". In the context of the PMP, the term treated is synonymous with the application of larvicides, and does not refer to a treated water system (e.g. with chlorine). With respect to maintaining buffer zones from wells and other water sources, bacterial pesticides have been exempted from this requirement by sections of the Integrated Pest Management Regulations (as is shown on page 38 of the draft PMP). 4. Devices such as the Mosquito Magnet Defender are currently being tested in some areas of the GVRD as a possible alternative to using non-selective pesticides such as malathion for adult mosquito control. I am not aware if testing has been concluded, and if it has, what the results were. Two further e-mail exchanges were made to clarify the response that was provided.</p>
<p>March 19, 2009 (telephone call) Slocan Valley</p>	<p>Concerned about pesticide use in the Slocan Valley, where she lives. I explained the reason for the PMP, and the nature of the larvicides being proposed for use. She said she would read the PMP and call me if she had any further concerns.</p>
<p>March 20 and 21, 2009 (e-mails) Kaslo</p>	<p>Concerned that the IHA PMP was a duplication of the one held by the RDCK for his Electoral Area. Also concerned about funding, especially that his area was paying for larviciding under their own plan, but could perhaps not have to pay if they worked under the IHA PMP. I explained in my response that the intent of this plan is mainly to provide areas within the IHA that currently have no pest management plan in effect the ability to undertake mosquito larviciding should West Nile Virus be confirmed in a localized area. I was aware that your Electoral Area D had a plan in place, as I have been in contact with Don Nash and Nicole Ward of the RDCK. The Interior Health plan will supplement, not replace, any existing plans. Local governments may choose to conduct their mosquito control activities under either their own plan or the Interior Health Plan. I explained that I am not involved in the budgeting process for mosquito control. I told him that I was advised, however, that the provincial Health ministry has been distributing grant money each year (through the UBCM) to local governments and First Nations to undertake mosquito control. My contact with Interior Health, Kevin Touchet, may be able to provide you with a more detailed response to the funding questions you</p>

	have posed. I gave him Kevin's contact information.
March 20, 2009 (e-mail to Kevin Touchet) Revelstoke	Concerned about lack of consultation, whether the draft plan had been reviewed and approved by the MHO and the Board, the use of methoprene, and why the project was being undertaken by an outside third party. Requested access to all files dealing with the third party and consultations. Prepared a draft response for Kevin Touchet to the questions posed in the e-mail on March 22, 2009.
March 23, 2009 (telephone call) Silverton	Concerned about the aerial application of Bti in her area. She is very allergic to the surfactant. I advised her that aerial application was extremely unlikely in her area, and I would make a note in the file to have her contacted if this was being considered. She was re-assured by my answer.
March 23, 2009 (telephone call) New Denver	Wanted more information about the intent of the plan. Was it new? I gave her a history of the Permit vs PMP process, and that the plan was mainly meant to cover areas not covered by existing plans. Talked about the toxicity of the products proposed for use. We also discussed that the plan, if used, would be by "agents" at the local government level or by First Nations. She seemed re-assured by my answers. Promised to have the interview published in the local paper to inform residents and alleviate their concerns. Published on March 25, 2009 in the Valley Voice newspaper.
March 24, 2009 (e-mail) Nakusp	Concerned that the type in the newspaper advertisement was so small. She has strong concerns about all the implications of spraying the biological control agent pesticides from helicopters and fixed-wing aircraft. Also concerned that the PMP covers five years, until April 15, 2014, and that there is nothing in the notice indicating that residents in the area of the spraying will be notified of the times spraying will be done. Wanted to know if this plan includes large areas of aerial spraying of biological control agents, there should be a public meeting addressing the issue and giving residents who will be affected the right to discuss this at the meeting. Responded to by e-mail on March 25, 2009. Explained that the size of the ad and wording was governed by provincial legislation and that the ads were twice the minimum size required. Legislation specifies that the PMP be for 5 years. No aerial spraying is proposed for her area, there has never been a mosquito problem there historically. If WNV was detected in her area, the decision to larvicide would be made at the local government level (not by IHA), and the local government would operate as an authorized agent of this PMP. No further response received.
March 26, 2009 (telephone interview) Revelstoke	Had questions about (1) why not advertised in Revelstoke newspaper (2) toxicity of products proposed for use (3) history of mosquito control and WNV status (4) aerial application (5) who will make decision to larvicide. I advised him that as Revelstoke was not in the proposed PMP area, there was no advertising done in the Revelstoke paper. Explained the toxicity of each pesticide proposed for use. Gave a history of mosquito control in the IHA, and explained the permit vs the PMP system. Explained that the RDCK already has a "nuisance" PMP for some areas, and that the intent of this PMP is to provide local governments and First Nations the legal means to larvicide in areas where there is no PMP (now that the previous permit is no longer in effect), and where WNV has been detected. No aerial larviciding is proposed in the central kootenays, as there is ground access. All decisions on whether or not to larvicide will be made at the local government level, not by IHA. He promised to have the interview published in both the Revelstoke Newspaper and the Arrow Lakes newspaper.
March 26, 2009 (telephone interview) Nelson	Had questions about (1) the public response to date from the February 18 <sup>th</sup> and 19 <sup>th</sup> advertisements in the Nelson Daily News. (2) toxicity of products proposed for use (3) history of mosquito control and WNV status (4) aerial application (5) who will make decision to larvicide. I advised him that there has not been a great deal of

	<p>public response, and the main concerns were aerial larviciding, who would make the decision to larvicide (IHA or local government) and the toxicity of the pesticides proposed for use. . Explained the toxicity of each pesticide proposed for use. Gave a history of mosquito control in the IHA, and explained the permit vs the PMP system. Explained that the RDCK already has a “nuisance” PMP for some areas, and that the primary intent of this PMP is to provide local governments and First Nations the legal means to larvicide in areas where there is no PMP, and where WNV has been detected (now that the previous permit is no longer in effect). No aerial larviciding is proposed in the central Kootenays, as there is ground access. All decisions on whether or not to larvicide will be made at the local government level, not by IHA. He promised to have the interview published in the Nelson Daily News on March 30<sup>th</sup> or 31<sup>st</sup>, 2009.</p>
<p>March 27, 2009 (telephone call) Sechelt</p>	<p>Was concerned about larviciding in the Ymir area where they vacation and/or have a summer home? Concerned about the possible toxicity to non-target species. Based on information provided by the RDCK (Don Nash), advised her that the plans were to only larvicide in the Duncan Dam area, which is in electoral area D. Advised her to contact either Don Nash or Andy Shadrack (Electoral Area D director) for further information.</p>
<p>March 27, 2009 (telephone call) Kaslo</p>	<p>Wanted information on the consultation process. Was not happy that advertisements were not placed in the Valley Voice, a bi-weekly newspaper published in New Denver. He wanted us to extend the 30-day deadline for response so that he has a chance to organize a community protest. When asked if he had read the PMP, he said no. I gave him access information (the IHA) web site link. Explained the purpose and intent of the PMP, the pesticides proposed for use, and the fact that the RDCK had a PMP already in place for Electoral Area D (his area). He gave me the impression that he was going to pursue his dissatisfaction with the consultation process to IHA, MoE, and at the Ministerial level. It was almost like I was being interviewed by a reporter. I advised him to read the PMP and again contact me if he had specific concerns.</p>
<p>March 27, 28, 29 and 31 (telephone calls and e-mails) Nelson, Nakusp, Kamloops, and Kelowna</p>	<p>Calls from Interior Health field and office staff who have been getting calls and e-mails from concerned residents of the Central Kootenays. I provided each of them with background information on the intent of the PMP, about WNV, the products proposed for use, that there were existing PMPs throughout the IHA held by local governments for nuisance mosquito control, and that this PMP would only be used if WNV was detected in a localized area or neighbouring jurisdiction. I also explained about authorized agents, and how all decisions on whether to larvicide locally would be made by local governments, not by the IHA. I answered numerous other questions that would help them communicate better in the future with concerned citizens who contacted them. I gave them my contact numbers in case people who contacted them needed further information that they couldn't provide</p>
<p>March 29, 2009 (e-mail) New Denver</p>	<p>Received a copy of a letter written to Minister Mary Polak (from the gentlemen who called me on March 27, 2009 from Kaslo.</p>
<p>March 30, 2009 (e-mail) MoE, Victoria</p>	<p>Advised that they had received a copy of an article that appeared in the Columbia Valley News (Invermere), and wanted further information about the article and the author. <a href="http://columbiavalleynews.com/news/2009/03/25/interior-health-consultation-on-west-nile-virus-plan/">http://columbiavalleynews.com/news/2009/03/25/interior-health-consultation-on-west-nile-virus-plan/</a></p>
<p>March 31, 2009 (telephone call) MoE, Victoria</p>	<p>Advised them that the author of this report was the person I talked to from Kaslo on March 27, 2009. We discussed his concerns about the flawed consultation process, and about the inaccurate and erroneous statements contained in the article. I explained that the choice of newspapers to advertise in and the specific wording in</p>

	the advertisements were discussed with, and approved by, MoE in Penticton prior to the consultation process being initiated. They agreed that they had no problems with how public consultation was carried out.
April 1, 2009 (telephone interview) CBC in Nelson	Wanted to know when spraying would start. I explained the intent of the PMP, and that any larviciding would be done locally by local governments only if WNV was confirmed as being present. I tried to explain several other things about the PMP, but they seemed to lose interest in the interview once they found out that spraying was not imminent.
April 2, 2009 (Letter to IHA) Revelstoke	Letter from an environmental society. They want the main focus of the PMP to be public education and wetland management, not the use of pesticides, which they claim will result in fewer adult mosquitoes and less food for fish, birds, mammals and amphibians. They say that because WNV has not been detected in humans in BC, they larviciding shouldn't be done. Revelstoke is not in the proposed PMP area.
April 3, 2009 (e-mail letter) Winlaw	Concerns about use of Bti and methoprene near certified organic farms. After discussions with IHA, Section 4.4 of the PMP was modified to require authorized agents to contact the Kootenay Organic Growers Society (KOGS) to determine locations of organic growers and to take precautions for their protection, as outlined in the "Organic Production System General Principles and Standards" (Government of Canada, Canadian General Standards Board (2006). KOGS was advised of this change by e-mail.