



Conservation

Climate Change and Environmental Protection Division
Environmental Assessment and Licensing Branch
123 Main Street, Suite 160, Winnipeg, Manitoba R3C 1A5
T 204 945-7100 F 204 945-5229
www.gov.mb.ca/conservation/eal

April 27, 2011

The City of Winnipeg
Public Works Department
Parks & Open Spaces Division, Insect Control Branch
1539 Waverley Street
Winnipeg MB R3T 4V7

Attention: Taz Stuart, M.Sc., P. Biol., City Entomologist

Dear Mr. Stuart:

Re: Pesticide Use Permit Changes

I am responding to your letter of February 8, 2011, requesting an alteration to the Pesticide Use Permit (PUP) for the City of Winnipeg. The proposed change is to "amend the minimum criterion for fogging from the current 3 consecutive days of 25 adult female nuisance mosquitoes in New Jersey Light Traps, to 2 consecutive days."

To support the proposed alteration, you provided historical data that might be interpreted to demonstrate 2 days is sufficient to predict the need for commencing an adult mosquito control program. Further, you state in your letter that the purpose of the recommended change is to "have the ability to make an early, definitive decision to enable the treatment for adult mosquitoes to occur earlier in the hatching cycle, preventing the adult mosquito population from building to higher levels."

The criterion of mosquito trap counts is part of the Adulticiding Factor Analysis (AFA) Guidelines and is one of six criteria, or factors, used to determine the AFA Level. The specific wording in the AFA Guidelines is included as an Appendix in the City of Winnipeg's Pesticide Use Permit (PUP). Further, the 3 consecutive day criterion is included in the American Mosquito Control Association's Best Practices and it is also referenced in the 2004 Municipal Mosquito Control Guidelines by Health Canada.

At this time, I am prepared to amend the 2011 Pesticide Use Permit for one season only. Prior to making a decision beyond 2011, I require the following from the City:

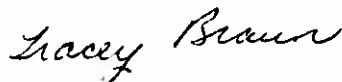
- Additional information to support this proposed deviation from the American Mosquito Control Association's Best Practices and Health Canada's Municipal Mosquito Control Guidelines; and

- A 2011 post season summary report which shall include an assessment of the environmental and health effects of this change as observed during the 2011 season. The report should also document how this change improved the City's ability to make early definitive decisions for the treatment of adult mosquitoes thus preventing the adult mosquito population from building to higher levels.

As an aside, it has been brought to my attention that the City's interpretation of this one criterion may differ slightly from what is actually stated in the PUP. The PUP specifies that "the Applicant shall only conduct an Ultra Low Volume residential adulticiding control program when the "Adulticiding Factor Analysis (AFA) falls into and **remains** in the high category (AFA High-Range 15-18), as listed in Appendix A. In previous correspondence, you allude to this only being required once per season which is incorrect. Please confirm your interpretation and current implementation of this clause.

If you have any questions or require further clarification, please feel free to contact Mr. Randy Webber at 945-7107.

Yours truly

A handwritten signature in cursive script that reads "Tracey Braun".

Tracey Braun, M.Sc.
Director
Environmental Assessment and Licensing Branch