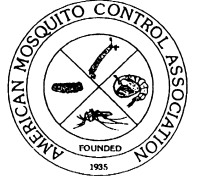




*Individuals enhancing the health and quality of life through the suppression of mosquitoes, other vectors and pests of public health importance.*



A Partner in the EPA's Pesticide Environmental Stewardship

Dear AMCA Member,

During this past AMCA Legislative Conference, an alarming number of congressional offices that did not support a legislative fix to the NPDES problem argued that the permit was not significantly burdensome to mosquito control organizations to merit redress. Indeed, media is reporting that environmental groups opposed to a legislative fix in our favor echo the idea that the costs are minimal - in their minds confirming their contention that our concerns about the costs of NPDES compliance have been greatly exaggerated and can thus be ignored.

Without genuine cost data, the fact that the imposition of NPDES is unnecessary will not win the day as a standalone. Until the AMCA can provide data conclusively demonstrating that there are very real substantive costs associated with this regulatory burden that compromise our ability to protect the public, we will lose the support of legislators who are not willing to incur the wrath of environmentalist interests who will demagogue this fix as "anti-clean water."

Last year, I had asked for data on NPDES costs and received a dismayingly small response from the membership. This was duly noted at the time by congressional sources pushing for a legislative solution and they were not pleased. If we are unwilling to take the time to provide a solid cost/benefit rationale to protect our own interests, why should politicians assume the risk in our stead?

Allow me to once again ask that you compile data regarding ALL costs associated with NPDES compliance, including, but not limited to those below. ANY cost attributable to NPDES compliance needs to be taken into account. This shouldn't take long so I fully expect each district to provide me with the data. The more data sets I have, the stronger case I can make. At a minimum, please provide me costs for the following:

1. Administrative time (cost) allotted toward researching means to comply, e.g. researching new vector control equipment, data packages, computers, etc.
2. Time/funds spent for staff and administrators attending conferences/webinars, etc learning about NPDES reporting requirements.
3. Field employee time (cost) spent compiling and entering data specifically designed to meet NPDES requirements.
4. Staff time (cost) spent educating trustees/commissioners and the public about NPDES-related matters.
5. What components of your program have been compromised or dropped because resources were diverted elsewhere to meet NPDES requirements.
6. If you can provide a scientifically defensible instance of disease occurrence that can be attributable to funding shortfalls engendered by NPDES costs.

When I have received I'll compile a list of what could have done to protect public health with the money expended toward NPDES compliance. I think Congress might be surprised at how much, both locally and nationwide, NPDES has cost in terms of public health protection. We may also need this data as background for congressional testimony.

I can't emphasize enough how critical this information is for a successful resolution to the NPDES problem. If the AMCA membership will not provide it, the ultimate institutionalizing of NPDES will be of our own choosing. Please compile the cost data forward it to Joe Conlon at [joc@mosquito.org](mailto:joc@mosquito.org) as soon as possible.

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