



PITTSFIELD BOARD OF HEALTH

Alan G. Kulberg, MD, Chairperson

Steve Smith, MA ~ Brad Gordon, JD ~ Katrina Medders, RN ~ Kimberly Loring, PMHNP-BC

July 6, 2021

TO: Honorable Members of the City Council

FROM: Alan G. Kulberg, MD, Chairperson

RE: Board of Health response to City Council's vote to discontinue mosquito spraying

At the April 27 2021 meeting of the City Council, the Council voted in support of Councilor Maffuccio's petition "to opt out of the mosquito spraying program after recent studies show that mosquito spraying is not supported by science, and is bad for the environment and bad for humans." City Council proceeded with a vote without representatives from the Health Department, Berkshire County Mosquito Control Program (BCMCP) or the Board of Health invited to the meeting to answer questions from Councilors. On behalf of the Board of Health, I ask for your reconsideration on this matter for the following reasons:

1. Board of Health oversight and expertise

In 2012, oversight of the Berkshire County Mosquito Control Program's (BCMCP) activities in Pittsfield and development of the Pittsfield Comprehensive Mosquito Control Plan was delegated to the BOH. Since then, the BOH conducts a review of BCMCP annual reports for control activities in Pittsfield and develops and approves the annual comprehensive plan in collaboration with BCMCP. The BOH also references the MA Arbovirus Surveillance and Response Plan and takes input from City Council and residents into consideration for the annual plan. Members of the BOH and the Health Department Director utilize sound public health principals outlined by MDPH to monitor and mitigate the public health risk of mosquito borne disease. BOH members and the Health Department Director have 23 years of combined experience in overseeing local mosquito control. Our approach to pesticide use is based on public health risk and science and is very conservative. Every effort is made to provide adequate public information in advance of mosquito spraying.

2. Public health need for a phased response plan including spraying;

Since 2000, there have been 221 cases of WNV among MA residents resulting in at least 12 deaths and 43 cases of EEE resulting in at least 22 deaths. People who survive EEE disease will often be permanently disabled due to neurologic damage. EEE and WNV are endemic diseases in MA which, although rare, are serious and likely to pose continued threats to human health. Historically, clusters

of human cases have occurred over a period of 2-3 years, with a variable number of years between clusters. This is year 3 of a cluster, making the need greater for all mosquito control options available in Pittsfield.

3. Criteria for spraying is specific and conservative:

- BCMCP and MDPH present surveillance data to the Health Department Director and BOH. BCMCP makes recommendation for spray application plan as conditions warrant an intensified response. Approval is required from the Pittsfield Board of Health prior to application for treatment to areas surrounding the virus isolation. The criteria threshold for a spray application is available upon request from the Health Department.
- See attachment for data summary of spray application. 0 spray response in 2020 and 1 spray response in 2019.

4. Appropriate Product Use

- MDAR consults with DPH, DEP, DFG and MAG to determine the options for pesticide use as well as spray efficacy monitoring and environmental monitoring
- The MDPH 2021 Arbovirus Surveillance and Response Plan continues to recommend standard, locally determined adult mosquito vector control efforts including targeted ground adulticiding operations, in response to a moderate risk category for WNV and EEE transmission and critical modifying variables including the time of year, mosquito population abundance and proximity of virus activity to populations.
- Truck Mounted Application is an ultra low volume application of pesticide from truck mounted nozzle. The product is Duet – Category IV, “Practically Non Toxic” pesticide. It is applied according to manufacturer guidelines by experienced staff of BCMCP. It is applied after sunset and before dawn when the targeted mosquito species is active. This is also when most residents are in their homes, thereby minimizing exposure to the product.
- Residents may request to be excluded from Wide Area Pesticide Application by submitting an Exclusion Request Form which can be obtained at <http://www.mass.gov/eea/agencies/agr/pesticides/mosquito/pesticide-application-exclusions.html> If it is not possible to access the automated process, a hard copy form can be provided by BCMCP. Exclusion requests may be submitted at any time of the year and will take effect 14 days after the request is made.

5. PFAS in mosquito spray product - concern has been addressed

The EPA determined that the substance found was leached from the containers holding the product. Manufacturers of the containers have notified all customers of recalls and have stopped shipments of all products in these containers. In our consultation with MDPH Bureau of Toxicology, they confirmed that product testing for PFAS will be done by MDPH on the approved spray products prior to MCP use this season.

Surveillance for virus in the mosquito population is underway and the presence of virus typically begins mid-late July with amplification of virus occurring in August and into September. Please consider a presentation of this information at the next meeting of City Council by the Health Director Armstrong and members of the BOH and a vote in support of the BOH to proceed with its 2021 Comprehensive Mosquito Control Plan that was approved on April 12, 2021.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Alan G. Kulberg", written in a cursive style.

Alan G. Kulberg, MD, Chairperson