

1. Your first quote is from a blog. David Jurgens specifically instructed us not to cite blogs. Furthermore, this blog is written and hosted by an action committee dedicated to ending mosquito spraying programs. Neither the blog nor your materials provide links to where the Center for Disease Control and Prevention and the American Mosquito Control Association say that spraying is the least effective solution. In fact, the EPA article that you cite later in your document actually describes mosquito spraying as the “fastest and best” option: “Using an EPA-registered pesticide is one of the fastest and best options to combat an outbreak of mosquito-borne disease being transmitted by adult mosquitoes.” <https://www.epa.gov/mosquitocontrol/success-mosquito-control-integrated-approach>
2. Harris County did not say that larvicide is their first step. The Field Operation Manager said that larvicide is “efficient” but that “once you have mosquitoes on the wing, the larvae aren’t the ones that have the virus.” Harris County’s primary concern is reactive vector control, therefore adulticide is their primary means of mosquito control. If you have documentation that supports your claim that larvicide is Harris County’s “#1 step”, then include a link to your source. Otherwise, remove this claim.
3. Your quotation from the WHO article includes emphasis that is not in the original article. Remove the editorially added emphasis.
4. What was the “major impact” found by ABC in 2009 through the use of dunks. Do you have numbers for this claim or is this the opinion of the sales guy?
5. What was the means by which ABC determined that fogging was the cause of the rise of mosquitoes in 2010 when they resumed spraying? What chemicals were they using? What time did they spray? Can they provide the original contract for the services provider? Do you have numbers to support this claim that the mosquito fogging was the cause of the rise in mosquito population? Or is this, once again, the opinion of the sales guy?
6. “Nearly all published studies of ULV efficacy...” — this study in Nice, France was looking at the chemical deltamethrin. This is not a chemical we are considering. Do you have peer-reviewed documentation that concerns the chemicals that we are actually proposing to employ?
7. “reactive space spraying” quotation— I notice that you have cherry picked this quotation out of context. Here is the sentence in its entirety: “Previously successful control programs were replaced by the reactive space spraying of insecticides during emergencies, a measure with high visibility and political appeal but low impact unless integrated with other control strategies.” If you place this sentence in the context of the article, it states that proactive spraying, as part of an integrated mosquito control program, is far superior to the reactive spraying of, say, an “as needed” basis. However, this doesn’t support your thesis of “no fogging”, unfortunately.

8. “The EPA lists adulticide...” — Well, it is factually true that it is listed fourth. However, you are trying to imply that it is #4 because spraying is not a preferred option by the EPA. This is patently false. As I mentioned earlier, this article that you cite, but do not quote from, describes spraying as “one of the fastest and best options”: “Using an EPA-registered pesticide is one of the fastest and best options to combat an outbreak of mosquito-borne disease being transmitted by adult mosquitoes.”
<https://www.epa.gov/mosquitocontrol/success-mosquito-control-integrated-approach>
9. “Mosquitoes become resistant to the pyrethroids” — First, you are citing a magazine article, not a peer reviewed journal. Second, while it is true that resistance to insecticides is a possibility, Harris County published a study last year in 2017 in The Journal of Vector Ecology that demonstrated that our local mosquitoes do not currently indicate any levels of resistance. Here is a link to their study:
<https://onlinelibrary.wiley.com/doi/pdf/10.1111/jvec.12268>
10. “People who may be particularly sensitive...” — Again, this is not from a peer reviewed journal. Rhode Island is very different from Houston. Here is what the CDC says about truck spraying safety: “What should I do during or after spraying? Spraying is safe. You do not need to leave an area when truck spraying for mosquito control takes place. If you prefer to stay inside and close windows and doors when spraying takes place you can, but it is not necessary. If you are having any type of health problems after spraying, contact your doctor or healthcare provider. The spray does not harm pets, but you may choose to bring them inside when spraying occurs.” <https://www.cdc.gov/zika/pdfs/TruckMounted-FactSheet.pdf>
11. “They are an important link in the food chain” — Again, more information from a website, not a peer reviewed academic study.
12. “Pyrethroids are toxic..” — Again, this is a statement out of context. Here is the full quotation: “When applied according to label directions, **pyrethroids used in mosquito control programs do not pose unreasonable risks to wildlife or the environment.** Pyrethroids are low in toxicity to mammals and are practically nontoxic to birds. However, pyrethroids are toxic to fish and to bees.” (My emphasis added). Furthermore, different pyrethroids have different levels of toxicity. For instance, the pyrethroid resmethrin (which we are not considering even though ABC tried to propose it) has indeed been found to have high levels of toxicity to fish and bees. Do you have a peer-reviewed source that addresses the fish and bee toxicity of permethrin?
13. “Pyrethroids, like all toxins, are indiscriminate...” — Again, this is a blog, not a peer reviewed article. The author describes herself as an “animal welfarist” and states that she is “self taught” and writes from a “personal point of view”. Replace with a peer-reviewed source or remove.

14. “Implement commercial grade dunks...”— What is your peer-reviewed source for dunks as a preferred alternative to spraying?
15. “Fogging in Spring Shadows only effects the Street...”— What is the source for your claim of the limited efficiency of spraying? A peer reviewed study?
16. “botanicals can also be used as reducing and capping agents”— Within the context of the article, they are discussing the use of plants as an unknown agent of mosquito control. The author states that this is a new development and is, as yet, untested. The botanicals referred to here are plant elements that have been broken down into nanoparticles. This technology is not available to the public, so it does not make sense to recommend it to the neighborhood.