



NATURAL RESOURCES COMMISSION

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May 21, 2021

RE: Mosquito Control

Dear Members of the 21st Century Mosquito Task Force,

Recognizing the many dangers to human health from pesticides, the Town of Wellesley has managed its town lands under an organic integrated pest management plan since 2002. We conduct extensive public outreach to educate our residents about the benefits of eco-friendly landscaping. Our town annually requests exclusion from the State's Wide Area Applications of Pesticides program. We are currently conducting a community-wide initiative to increase our valuable insect pollinator populations in our town.

We are therefore writing to express our concerns about the widespread use of toxic pesticides to manage mosquitoes, and to ask your Task Force to develop a Mosquito Management Policy that controls mosquito populations using proven, effective ecological methods. We request pesticides only be used as a last resort during a declared public health emergency, and only after all other preventative measures have been exhausted.

In 2019, despite mosquito monitoring which showed no evidence of mosquitoes in Wellesley carrying Eastern equine encephalitis (EEE), parts of Wellesley were nonetheless subjected to broad aerial spraying of the insecticide Anvil 10+10, which contains the synergist ingredient Piperonyl butoxide (PBO), which is listed as a Class C carcinogen, and is highly toxic to especially amphibians, particularly at the tadpole stage. In the days leading up to the spraying, town staff and officials heard from many concerned residents who asked how they could protect their organic vegetable gardens and honey bees, as well as birds and insects like fireflies and dragonflies, from these non-discriminate chemicals. (The irony here is that dragonflies and frogs are natural predators of mosquitoes.) Many residents were upset and angry that they and their children were being subjected to these chemicals - especially with no cases of EEE in Wellesley - and that there was no way to opt-out of the broad-based spraying. Several residents questioned why, if the chemicals were safe, they were being advised by the State to stay inside and close their windows.

After the spraying, it was learned that the product sprayed, Anvil 10+10, also contained high levels of per- and polyfluoroalkyl substances (PFAS), “forever chemicals.”^{1 2} “PFAS exposure has been associated with changes in liver and kidney function, changes in thyroid hormone and cholesterol levels, and immune system effects. PFOA and PFOS have also been shown to cause developmental effects to fetuses during pregnancy.”³

Now, two years later, high levels of PFAS chemicals have also been found in our Town’s drinking water supply, which has necessitated the Water Department to take one of our water plant facilities offline.⁴ The discovery of these high levels of PFAS has disrupted Town operations, raised health concerns among our residents, and will ultimately cost our taxpayers in higher water rates.

Regardless of the source of this PFAS contamination, it is time to stop the use of toxins in our environment, including those used to control mosquitoes. Safer options exist. Wellesley has long been a leader in pesticide reduction, and we ask the State to not undermine our efforts. We ask the 21st Century Mosquito Task force to use the latest scientific knowledge available to develop a science-based, ecological mosquito management policy, which includes the elimination of aerial spraying of pesticides.

On behalf of the Wellesley Natural Resources Commission,

Brandon Schmitt, Director

¹ Boston Globe December 1, 2020 <https://www.bostonglobe.com/2020/12/01/metro/toxic-forever-chemicals-found-pesticide-used-millions-mass-acres-when-spraying-mosquitos/>

² EPA: <https://www.epa.gov/newsreleases/epa-releases-testing-data-showing-pfas-contamination-fluorinated-containers>

³ Mass.Gov <https://www.mass.gov/service-details/per-and-polyfluoroalkyl-substances-pfas-in-drinking-water>

⁴ https://wellesleyma.gov/DocumentCenter/View/24320/PFAS-news-release_FINAL562021