

December 17, 2007

Via Fax (703-358-2248)

Michael Higgins, Biologist
National Wildlife Refuge System
U.S. Fish & Wildlife Service
4401 N. Fairfax Drive, Room 670
Arlington, VA 22203

RE: Committee of the Islands Comments on Fish and Wildlife Service,
Department of the Interior, Draft Mosquito and Mosquito-Borne Disease
Management Policy

Dear Mr. Higgins:

The Committee of the Islands (COTI), a Florida not for profit corporation which is based in Sanibel, Florida, provides the following comments on the Fish and Wildlife Service, Department of the Interior, Draft Mosquito and Mosquito-Borne Disease Management Policy. We understand from your email message dated November 26, 2007 that the comment period which ended on November 29, 2007 will reopen in the near future and on that basis ask that these comments be accepted as timely.

COTI was founded in 1975 by those who helped to incorporate Sanibel Island as a city. Guided by the mission of Sanibel's founders, we seek to protect the environment, to preserve the sanctuary character of our barrier island community, and to protect the quality of life for Sanibel's citizens.

The City of Sanibel is recognized nationally for its environmentally conscious land development regulations and its emphasis on preservation of natural wildlife and vegetation. The City has always been proud of the fact that this island is also the home of the J. N. "Ding" Darling National Wildlife Refuge. This refuge is virtually surrounded by the boundaries of the City of Sanibel and therefore it has always been essential that the citizens of Sanibel and the management of the refuge have a mutually beneficial and cooperative relationship.

Our county's Mosquito Control District has worked in cooperation with the staff of the refuge since the refuge was established to provide for control of mosquitos without eradicating them. When control is used, only larvicides, consisting of the naturally occurring bacteria (*Bacillus thuringensis*; control agent = BTI), are used, never the more environmentally damaging adulticides. Mosquitos certainly are still a part of our island's ecology and they contribute to the food chain. But the mosquito population cannot be allowed to reach levels that would threaten the continued and established human settlement population of the City of Sanibel and surrounding areas.

We are concerned that if no mosquito control is conducted in the refuge, the Mosquito Control District will have to use the more environmentally damaging adulticides in areas around the refuge.

The current draft policy currently can be interpreted to preclude mosquito control on the refuge until after a disease outbreak occurs. This would be unacceptable for the residents and businesses on Sanibel. It would cause potentially severe health impacts, a deterioration of the quality of life, as well as very negative economic consequences.

As it relates to Sanibel, we strongly believe that the following statement in the current draft policy is incorrect: "Because this draft policy is not expected to affect activities in the surrounding area or to incur costs to the public, it would not have a significant effect on small businesses engaged in activities around the impacted refuges. Small governmental jurisdictions and independent nonprofit organizations are not expected to be affected. Therefore, we certify that this document would not have a significant economic effect on a substantial number of small entities as defined under the Regulatory Flexibility Act (5 U.S.C. 601 et seq.)."

Mosquitos can and do spread disease within wildlife populations and can damage the health of the birds for which the J.N. "Ding" Darling National Wildlife Refuge is so well known. Such a result would be contrary to the mission of the U.S. Fish and Wildlife Service.

COTI supports the position of the City of Sanibel as stated in the City's comment letter to you dated November 27, 2007. A "one size fits all" mosquito control policy for all National Wildlife Refuges is not wise. We therefore join the City of Sanibel in recommending that the policy wording be revised as follows:

1. Change the main policy statement "we will allow populations of native mosquito species to function unimpeded unless they cause a human and/or wildlife health threat," to: "We will allow populations of native mosquito species to co-exist with other species on the National Wildlife Refuges at levels that provide for their continued contribution to the ecological food chain while not threatening the public health and welfare of the surrounding human communities or the health of Refuge wildlife."
2. The allowed mosquito population levels in the above statement must then also be defined as: "A threshold level of mosquitos as determined by a Refuge-specific mosquito

management plan as cooperatively developed between the Refuge Manager and local entity tasked with mosquito control and public health in the adjacent human communities affected.”

Thank you for your consideration of these comments.

Respectfully submitted,

Lawrence M. Schopp
President,

cc: Sanibel City Council
Lee County Mosquito Control Board of Commissioners
Judith A. Zimomra, City Manager
Dr. Robert Loflin, City of Sanibel Natural Resources Director