

**From:** [Randy Crochier](#)  
**Subject:** Mosquito  
**Date:** Thursday, May 6, 2021 12:43:46 PM  
**Attachments:** [GLOUCESTER v3.pdf](#)  
[MSDS Anvil 10+10.pdf](#)  
[Erving- Application for Alternative Mosquito Management Plan 5-5-2021.pdf](#)  
[Erving- application-for-municipality-opt-out-of-srmcb-spraying- Final 5-5-2021.pdf](#)

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Greetings,

If you have received this email, please distribute to your Town Administrator, BOH members and Select Board members.

I had a goal to provide information to all towns by today, Thursday so that people would have time to familiarize themselves with the information prior to voting next week on the opt-out. Unfortunately after almost four weeks of research and asking of questions of those “in the know”, I feel like I have found very little solid information.

On its surface the thought of opting out is easy. Who would want that or any chemical sprayed in their community? However, the question is not that simple. I have tried to learn the determining factors that would trigger spraying in a community. This question has yet to be answered by EEA. It is my understanding that the State has not done surveillance in Franklin County in many years with the possible exception of after a tragic incidence in 2019 that may or may not have been directly attributable to a bite received in West County, if spraying is based on test results, it seems like there risk for spraying. If the criteria is based on human and/or animal illness or death it still appears the risk of spraying is low. Low but not non-existent.

Mosquito borne diseases can and do create serious illnesses. A review of the data at [mass.gov](https://www.mass.gov/info-details/massachusetts-arbovirus-update). <https://www.mass.gov/info-details/massachusetts-arbovirus-update> shows a low risk of these illnesses within Franklin County. All of this points to just why opt-out looks to be the simple thing to do.

What does it mean if a town opts out and then there is a serious human illness of EEE or West Nile? What are the options for treating the mosquito breeding grounds? What are the costs that will be incurred if a town has done the opt-out and has to do treatment on its own? What are the costs that will reportedly come off the ‘Cherry Sheet’ in your unrestricted State Aid if the state sprays in your community?

One recommendation that I do have is to explore if joining the Pioneer Valley Mosquito Control District makes sense for you town, practically as well as financially. I have to clarify this with saying that as you know, I am a member of the Gill BOH and Gill Select Board and we are NOT a member of the PMMCD at this time.

To join requires an affirmative Town Meeting vote. The cost, as I understand it is \$ 5000 per year. Service could start all most immediately after the Town Meeting approval.

The benefits of joining, as I see them are:

- You have more “boxes” to choose on the opt-out application to increase the strength of your application.
- You would have surveillance of, and advanced knowledge of, any potential concerns within your town
- You have documented evidence of what the mosquito population in your town looks like and what diseases are being found
- You are able to use this knowledge to “negotiate” with the State in regards to spraying if you do not opt-out OR
- You will be able to use this knowledge to help determine if some treatment is needed if you do opt-out (and have professional help to take care of it)

Joining the PVMCD is an obvious risk/reward decision on the part of each community.

Lastly, there is a state wide push for an extension of the May 15, 2021 to allow towns to perform their due diligence. Hopefully that come to fruition and we can continue to search for the elusive answers.

Below are a series of links as well as other hopefully helpful information for you,

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USEFUL LINKS TO REVIEW:

<https://www.nofamass.org/massquito/>

<https://www.massaudubon.org/our-conservation-work/advocacy/priority-legislation/mosquitoes/position-on-mosquito-control>

<https://www.mass.gov/state-reclamation-and-mosquito-control-board-srmcb>

<https://www.mass.gov/doc/2020-pioneer-valley-mcd-annual-operations-report/download>

<https://www.mass.gov/doc/2020-honey-bee-monitoring-report-for-the-aerial-mosquito-adulticide-application/download>

Educational Brochures from MA state boh <https://www.mass.gov/info-details/mosquito-borne-disease-prevention>

brochure: [Preventing Mosquito Bites Brochure: Massachusetts Health Promotion Clearinghouse \(state.ma.us\)](https://www.mass.gov/info-details/mosquito-borne-disease-prevention)

Kid friendly mosquito prevention brochure, available in english, Spanish, Portuguese [download \(mass.gov\)](https://www.mass.gov/doc/2020-honey-bee-monitoring-report-for-the-aerial-mosquito-adulticide-application/download)

[Mosquito Repellent Guidance for School Staff](https://www.mass.gov/doc/2020-honey-bee-monitoring-report-for-the-aerial-mosquito-adulticide-application/download)

Comments From Chris Craig of the PVMCD

**When is aerial spraying of insecticides considered?**

In communities that belong to a Mosquito Control District, truck-mounted ground spraying occurs when virus is found in mosquitoes. In situations where there is a high risk of human disease over a large geographic area – and the risk is not effectively being reduced by use of personal protection and truck-based spraying -- the response may include an aerial pesticide sprayed in the evening and overnight hours to reduce the number of infected, adult mosquitoes in areas of high risk. This allows for the rapid treatment of large areas of high concern that are not accessible by truck-mounted ground sprayers.

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**How is aerial spraying conducted?**

Aerial spraying is conducted by airplane or helicopter between dusk and dawn (approximately 7pm-4am depending on the time of year) in areas of concern. Mosquito control professionals apply an approved pesticide such as an ultra-low volume (ULV) spray. ULV sprayers dispense very fine aerosol droplets that stay in the air and kill adult mosquitoes on contact. Most droplets don't reach the ground and there is no residual effect of the product.

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**What product is used in aerial spraying?**

The pesticide used is Anvil 10+10, a product extensively tested and used to control mosquitoes in both ground-level and aerial spraying in the U.S. Anvil 10+10 contains two ingredients: Sumithrin and piperonyl butoxide. Sumithrin is an ingredient similar to the natural components of the chrysanthemum flower and is also found in other pesticide products used indoors, in pet shampoos, and tick control treatments. It is rapidly inactivated and decomposes with exposure to light and air, with a half-life of less than one day in the air and on plants. In soil, it breaks down rapidly and has proven to be extremely effective in killing mosquitoes worldwide for over 20 years. Piperonyl butoxide (PBO) serves to increase the ability of Sumithrin to kill mosquitoes.

The product is registered by the US Environmental Protection Agency (EPA) and in Massachusetts for this use. It has been used in aerial applications for mosquito control in 2006, 2010, 2012, and 2019, and is also used by some of the Mosquito Control Districts for ground applications.

EMAIL sent by me to Senator Comeford's Office

I am presently working with six towns, Buckland, Charlemont, Colrain, Gill, Hawley and Shelburne

assisting them with a decision to opt out or not. At this point,, any increase in time would be great! Ideally a date of June 12, would give the small towns an additional four weeks to gather information. Including an important question is in regards to State owned land. If a Town votes to opt out, does that State maintain the right to spray state owned parcels within that town?

At this point, each of these Towns have a meeting scheduled either Monday May 10, 2021 or Tuesday May 11, 2021. In order to provide their Select Board members time to make decisions, I should truly provide them with as much information as I can by Thursday of this week.

On April 14, 2021, I sent an email to [eeaopt-out@mass.gov](mailto:eeaopt-out@mass.gov) which asked the following – “Also, one of the towns I serve has a very large parcel of State owned land in their town. If they opt out, does that include the State owned land as well?” This holds true, to some extent to all of the towns. I received a response on that same day, for which I was grateful. However, the response was to tell me they received my email and are working on a response. As of today, I still don’t have that answer.

At this point, I am concerned that the six towns that I serve will be making decisions to opt-out or not with incomplete information and not being able to vet the options and risks associated with either choice.

There is also a concern related to filing an application to opt-out relying on the one area that is listed as mandatory, Education & Public Outreach. This option is the only mandatory item, however will a Town that chooses this option as their only option have their application approved to opt-out?

I am waiting now for a response to an inquiry as what is the criteria that triggers spraying in a town. For Franklin County, there has been no State testing of Mosquitos except after a 2019 episode in Heath. At that point there was testing in the surrounding towns

If we could provide another month to fully vet this program as well as require an opt-in vs an opt-out for the towns, it would allow the needed time in the midst of a pandemic to allow for Local Public Health to gain enough knowledge to make an educated, intelligent recommendation, not only in the Towns listed, but across the state.

EMAIL Received From Senator Hinds’ office (start the string from the bottom)

Hi Randy,

Thanks for the conversation today regarding the mosquito management questions facing the towns you serve. Please see below the initial response we received to the questions we posed to EEA. We'll let you know what more we hear from that office.

Best,

Jon

Jon Gould  
Hilltown Community Liaison  
Senator Adam Hinds  
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**From:** Zeringo, Serafina T (EEA) <[Serafina.T.Zeringo@mass.gov](mailto:Serafina.T.Zeringo@mass.gov)>  
**Sent:** Monday, May 3, 2021 3:45 PM  
**To:** Gould, Jonathan (SEN) <[Jonathan.Gould@masenate.gov](mailto:Jonathan.Gould@masenate.gov)>  
**Cc:** Cohen, Elena (SEN) <[Elena.Cohen@masenate.gov](mailto:Elena.Cohen@masenate.gov)>; Maher, Stephen (SEN) <[Stephen.Maher@masenate.gov](mailto:Stephen.Maher@masenate.gov)>  
**Subject:** [External]: RE: Mosquito spraying questions

Hi Jon,

Happy to check in with the team on these questions, in the meantime, I'd suggest referencing the Q&A that is already out there on the opt out applications, which can be found here: <https://www.mass.gov/info-details/application-for-municipality-opt-out-of-srmcb-spraying#municipal-opt-out-frequently-asked-questions->

In addition, I'll clarify that a complete application to be considered for approval requires the vote of the local governmental body and the education/public outreach piece. For some towns, this may be sufficient in order to be approved but it might not be for other towns depending on an array of factors.

Best,  
Serafina

**Serafina Zeringo**  
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**Subject:** Mosquito spraying questions

Hi Serafina,

I hope your week is off to a good start. Elena and I just got off a call with Randy Crochier, who serves as the Regional Health Agent for 11 towns in Franklin County in his position at the Franklin Regional Council of Governments. Mr. Crochier is helping the towns that he serves make informed decisions about whether to opt out of the state's mosquito control program. Sen. Comerford and Sen. Hinds represent these 11 towns: Bernardston, Buckland,

Charlemont, Colrain, Gill, Hawley, Heath, Leyden, Monroe, Rowe, and Shelburne. I also read in the April 29 edition of the Country Journal newspaper that Williamsburg, a Hampshire County town represented by Sen. Hinds, was considering opting out but some town officials felt like there was not enough time to explore the issue.

Mr. Crochier shared with Elena and me several questions that will help him in working with the towns. Might you or someone from the EEA team provide answers to the following questions?

1. Will education/public outreach alone by a town be enough to qualify for a successful opt out?
2. If a town is approved to opt out, will the opt out cover state-owned land within that town?
3. What testing is the state planning to conduct in Franklin County this year?
4. What metrics will be used to trigger aerial spraying within a town that hasn't opted out?
5. Would EEA consider delaying the filing of opt out applications until June 12 to allow for more informed decision making? Mr. Crochier said many of his towns weren't made aware of the opt out option until mid- April.

Best and thanks,

Jon

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#### EMAIL EXCHANGE WITH A PVMCD COMMISSIONER AND A LOCAL BOH MEMBER

"I have a question on mosquitos. The state gives the towns an opt-out option for spraying. Do you know about this? I'm thinking it applies to the 9 state overseen mosquito districts under SRMCB's watchful eye, and we are not in any of them. I also recall you talking to us about good breeding habitat around here and my flawed memory is that Charlemont is not a serious breeding ground. Is that correct?"

Response:

"I apologize for not being able to provide you with solid information before your BOH meeting last week.

I wanted to gather as much understanding from the PVMCD Coordinator as possible, especially concerning the state's requirements for municipalities to opt-out of their adulticide spraying. Unfortunately, these requirements are less than clear and I recommend reading the EEA's opt-out application webpage here, if you haven't already: <https://www.mass.gov/info-details/application->

[for-municipality-opt-out-of-srmcb-spraying](#)

In a nutshell, the state is concerned that not enough of its 351 communities belong to a mosquito control district to allow for a rapid response to a EEE outbreak (like the 3-year outbreak we are about to conclude). They would like to be able to use state resources to apply adulticide, during a public health emergency, in communities that do not belong to a MCD. Such spraying would be done on their own and at their cost, not via the regional MCD. There is an option for communities to opt out of their free spraying by following the application process in the link above. The EEA will review and decide if the town/city applicant has described a sufficient alternative Mosquito Management Plan. If Charlemont were to apply to the EEA for the opt-out exclusion by its deadline of May 15, it would need to show that it could independently hire a vendor that provides truck-mounted and/or aerial spraying, and have the means to pay for such a service. Another Plan requirement is to provide public education about mosquito-borne disease risks and how to take precautions.

To be clear, the Pioneer Valley Mosquito Control District and all other MCDs are not involved or affected in this policy or process. Because the state can perform spraying directly, and without MCDs, this process is between the state and all local governments. Being a member of the PVMCD may not be enough to opt out as we do not yet offer adulticide spraying services. We are telling member communities that we can help with the public education services, but that if they want to opt out they should prove that they can handle spraying services on their own.

As far as existing habitat suitable for increasing mosquito populations, yes, Charlemont has a fair amount of wetlands and maple swamps that have the potential (but, so do many of your neighbors). Without trapping and testing, no one can say for sure. MDPH sometimes performs surveillance for mosquito species and disease, so it's possible they've done so in Charlemont or that they have GIS maps of its habitats. MassGIS is a good public resource online for selecting your own map features and building one that highlights natural mosquito habitats.

I hope this is helpful. Please feel free to follow up with other questions and I promise I won't wait to hear from others before responding!"