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Subject: Attempt to re-classify the Otter creek flood planes from
class 2 to class 1 wetlands
Date: Jun 10, 2019 at 4:45:31 PM
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Cc: Russell Jones news@brandonreporter.com

Dear,

Town managers and Select Board members ,State senators,
representatives,and citizens

The BLSG insect control district representing the towns of Brandon
Leicester, Salisbury, Goshen,Pittsford and Proctor Is very concerned
about the attempt to re-classify the Otter creek flood planes from
Class2 to Class1 wetlands. In the third slide presented by Zapata
Courage ,District wetlands ecologist,it clearly states:" wetland impacts
permitted only for compelling public need to protect public health and
safety"(enclosure number one) Further, it states that "the protection to
class one wetlands is absolute"

In the last 10 years we have seen significant wetland easements
acquired by the USDA program under the ACEP-WRE/WRP Easement
program. More than 20 parcels , representing more than 3000 acres
have already been acquired. (enclosure number two).While we have
been able to work with the US department of agriculture's(USDA)
Natural resources

Conservation service(NRCS) Representative to continue applying
Larvicides to these wetlands,The process is more difficult and

complicated and requires additional staff time of the BLSG. Although more than \$15 million have been expended on this program and other programs to eliminate run off of phosphorus and other pollutants into the lake Champlain basin, the fact sheet, enclosed from NRCS, indicates that they have no funding for mosquito larvae control! (Enclosure number two)

We all agree that wetlands are an important resource for our communities, however, the water entrapment occurs because of the meandering nature of the slow-moving river and provides this protection during floods events to down area properties (Middlebury) whether class 1 or 2 designation.

Further, the US Fish and wildlife service has just put out our a "handbook for mosquito management on national wildlife refuges" (exhibit 4)

This is a 50 page dossier that states in the opening introduction: "The US Fish and Wildlife Service considers native mosquitoes as part of the natural ecosystem in the national Wildlife refuge system habitats Where The service, they occur. The US Fish and wildlife service (Service) allows mosquitoes on the refuge to exist unimpeded unless they pose a specific human or wildlife health issue. Again, They allocate no funds for surveillance or control of mosquitoes.

I bring these issues up because it's the next step once in class 1 to then move toThe classification as a National Wildlife refuge.

Class1 Classification also impacts farm use in these areas, and, I believe, impacts taxation of the land.

This Reclassification requires much more investigation and thought regarding all the potential impacts and should be rejected at this time.

As Chairman of The BLSG,it is my
Personal view that this Reclassification
Represents an End Run to further impede effective Mosquito control by
the district and should be rejected at this time. Thanks

Sincerely,

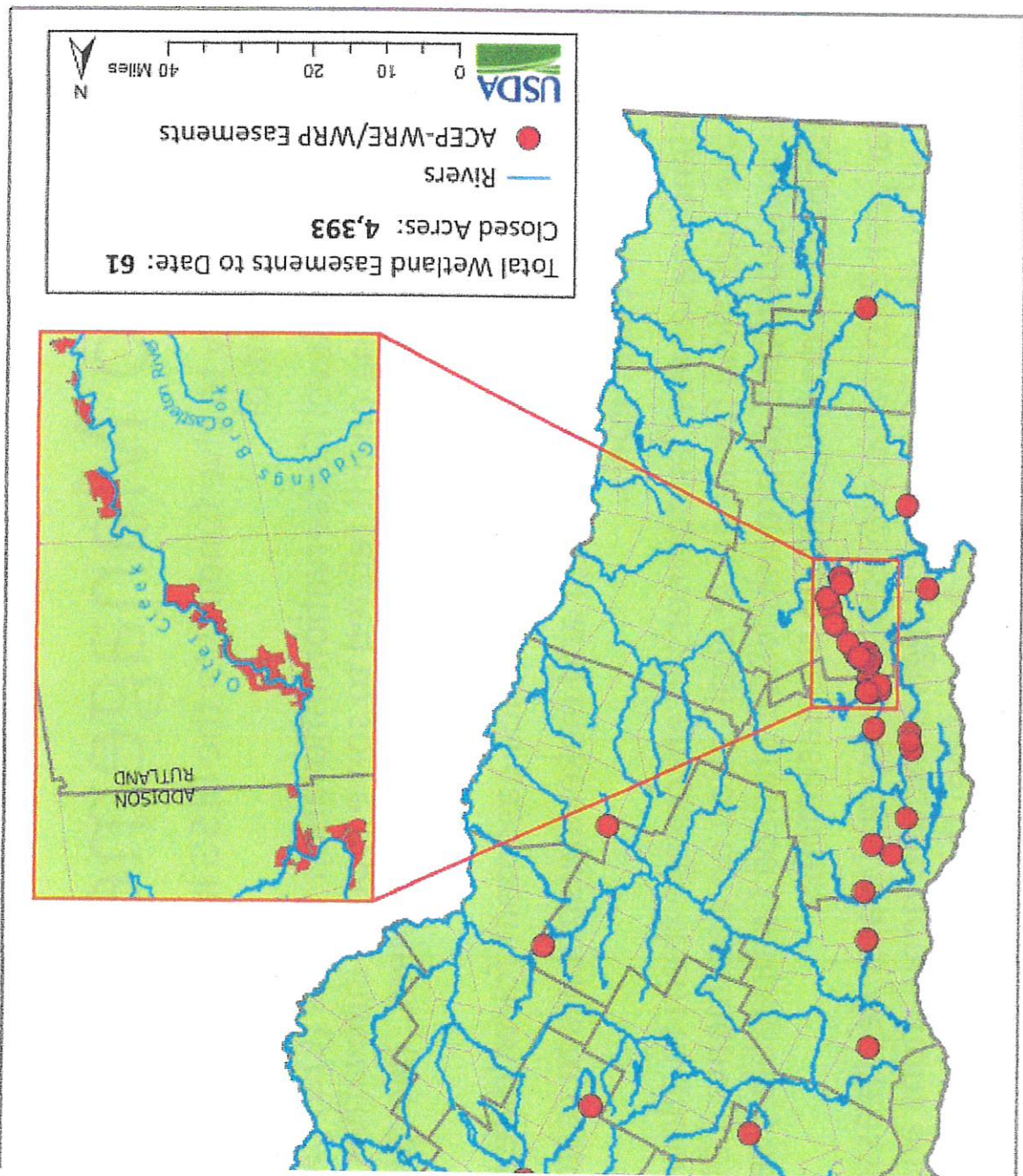
Dr. Benjamin Lawton, Chairman
BLSG Insect Control District

Sent from my iPhone

Class I, II, and III Wetlands: What's the Difference?

	Class III	Class II	Class I
Size	Small	Generally >0.5 acre (vernal pools are an exception)	Often Large (currently 10 – 730 acres)
VSWI* mapped?	Not usually	Often mapped	Always mapped
Functional Significance	None, but function may be present	Significant	Exceptional and/or Irreplaceable
Standard Buffer Size	None	50-feet	100-feet
Permit Requirement	None required	must demonstrate avoidance and minimization, no undue adverse impacts or non-compensable impacts	Buffer zone permits similar the same as Class II. Wetland impacts permitted only for compelling public need to protect public health & safety

*Vermont Significant Wetlands Inventory



Mosquito Management

- NRCS does not have the legal authority to give funding to the BLSG Insect Control District for mosquito larvae or adult mosquito control
- NRCS does have a National and State-level Conservation Innovation Grants (CIG) program that the BLSG could apply for project funding on if it related to some type of innovative conservation practice that related to wetlands and mosquito management. (No guarantees on which projects will be funded)
- NRCS has an in perpetuity commitment to manage wetlands easement for wildlife habitat
- NRCS has the legal authority and funding to monitor and make adjustments to restored wetlands to best meet habitat and other goals.
- NRCS has worked with wetlands easement landowners to encourage them to allow the BLSG to sample for mosquito larvae and allow for larvicide application on easements if State Health Department thresholds are exceeded and to provide NRCS-granted Compatible Use Authorizations that allow for BLSG to do this work on the easements
- NRCS has agreed in calendar year 2019 to do elevation survey and water depth assessments at wetland easements identified by the BLSG as having high mosquito populations and also those with low mosquito populations. We will take information from this work and identify where adjustments can be made to further restore wetlands and further abate mosquito populations

Introduction

The U.S. Fish and Wildlife Service (Service) considers native mosquitoes a part of the natural ecosystem in the National Wildlife Refuge System (Refuge System) habitats in which they occur. The Service allows mosquitoes on refuges to exist unimpeded unless they pose a specific human or wildlife health risk. Sometimes Refuge Managers are called upon to manage mosquitoes on-refuge in coordination with local public health or mosquito control organizations. This handbook applies to mosquito management activities related to reducing risks to public health from mosquito-borne disease.

A Refuge Manager may authorize others to conduct mosquito management activities on a refuge to protect public health when local, current mosquito monitoring data provided by the public health agency or an authorized designated representative indicate that mosquitoes on the refuge are causing, or are expected to cause, a public health threat. Mosquito management includes the following activities: planning, identification and inventory of mosquito species, surveillance and monitoring, establishing action thresholds, prevention, control (to suppress and/or reduce mosquitoes), restoration, research, and outreach and education activities used to minimize risks to public health. All Refuge System mosquito management activities, including Service planning documents, must be consistent with all applicable Federal laws, regulations and policies.

Unless mosquitoes interfere with refuge-specific management goals and objectives, or cause a public or wildlife health risk, they are allowed to exist unimpeded on a refuge. Mosquito-vectoring pathogens that cause disease are the primary public health concern associated with mosquitoes on a refuge. When faced with mosquito management decisions affecting Refuge System lands and waters, the Service's position is to work with public health agencies and/or mosquito control organizations using the most effective method or combination of methods that pose the lowest risk to fish, wildlife, and their habitats. Often, the Service's preferred mosquito management option is to use non-pesticide based tools.

Under Service policy, integrated pest management (IPM) is a sustainable approach to managing pests by combining physical, biological, cultural, and chemical tools in a way that minimizes health, environmental and economic risk. Effective mosquito management on refuges requires planning that follows the IPM principles. This handbook for mosquito management is a stepdown handbook for the Service IPM policy (569 FW 1).

Handbook for Mosquito Management on National Wildlife Refuges

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U.S. Fish & Wildlife Service

Handbook for Mosquito Management on National Wildlife Refuges



June 2018

“The mission of the National Wildlife Refuge System is to administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of the fish, wildlife, and plant resources and their habitats within the United States for the benefit of present and future generations of Americans.”

National Wildlife Refuge System Improvement Act of 1997

Photo credit: Don Brubaker, USFWS, 2011

Joy Albertson, Supervisory Wildlife Biologist, San Francisco Bay NWRC, and Jason Sequeira, Field Supervisor, Marin/ Sonoma Mosquito Control, and Vector District, CA dipping for mosquito larvae at San Pablo Bay National Wildlife Refuge.

Wetland Reserve Program Fact Sheet

Vermont- 2011

The U.S. Department of Agriculture's (USDA) Natural Resources Conservation Service (NRCS) is seeking applications from landowners for its Wetland Reserve Program (WRP). WRP is a voluntary program that provides technical and financial assistance to private landowners to restore, protect, and enhance wetlands in exchange for retiring eligible land from active agriculture. Restoration methods can include the installation of ditch plugs, water control structures, and/or tree plantings along river banks. Fields that are frequently flooded and/or are difficult to produce crops on because of wet conditions are good candidates for WRP. Other examples of eligible land include areas along rivers that link protected wetlands, and lands adjacent to protected wetlands that contribute to wetland functions and values.



Program Focus

This program focuses on wetlands because of all of the benefits they provide. Wetlands can provide critical habitat for fish and wildlife, including threatened and endangered species and waterfowl; improve water quality by filtering sediments, nutrients and chemicals; reduce flooding; recharge groundwater; protect biological

diversity; and provide opportunities for educational, scientific, and recreational activities such as hiking and nature photography.



Enrollment Options

WRP offers three enrollment options:

1. A *Permanent Easement* is a conservation easement in perpetuity. USDA pays 100 percent of the easement value and up to 100 percent of the restoration costs. In exchange for this easement, the landowner agrees to sell the development and agricultural rights from the land.
2. A *30-Year Easement* is an easement that expires after 30 years. USDA pays up to 75 percent of the easement value and up to 75 percent of the restoration costs.

In most cases the per acre value of an easement is based on a region-wide estimate of market values for different types of land. The average per acre payment for 2010 WRP permanent easements was approximately \$970. For both perma-

nent and 30-year easements, USDA and/or conservation partners pay all costs associated with recording the easement in the local land records office, including recording fees, costs associated with a survey, any appraisal fees, and title insurance.

3. A *Restoration Cost-Share Agreement* is a 10 year agreement to restore or enhance the wetland functions and values without placing an easement on the enrolled acres. USDA pays up to 75 percent of the restoration costs. Additional assistance may be available from conservation partners, such as the U.S. Fish and Wildlife Service.

Recent Changes to the Program

There have been some changes to WRP with the passage of the Food, Conservation, and Energy Act of 2008 (2008 Farm Bill). They include:

- Payments for easements valued at \$500,000 or more will be made in at least five annual payments.
- For restoration cost-share agreements, annual payments may not exceed \$50,000 per year.
- No easement shall be created on land that has changed ownership during the preceding 7 years, unless a waiver is granted by NRCS, and
- Eligible acres are limited to private lands.

More Information

Sign-up for this program is on a continuous basis. Ducks Unlimited, through a grant from the State of Vermont, is assisting the NRCS with sign-ups for this program in the Lake Champlain Basin. Wetland protection and restoration is a priority for both the State and Ducks Unlimited.

Landowners who are interested in this program can apply at their local county USDA Service Center or by contacting Ducks Unlimited representative, April Moulart at (802) 864-2989 or april@waterscapesvt.com. Vermont NRCS County office locations can be found at: <http://www.vt.nrcs.usda.gov/> and then by clicking on 'Find a Service Center' at the bottom, left side of the web page



Wetland Functions and Values Restored