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Dr. Curt Colwell PhD
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Dear Dr. Colwell,

September 22, 2011

On behalf of the Chicagoland Apartment Association, I commend the participants and chair, Curt Colwell, PhD., of the Illinois Structural Pest Control Advisory Council: Subcommittee on Bed Bugs, for their time and effort on this report. Since the minutes, written testimony and recommendations from the Chicagoland Apartment Association, other associations and individuals provided to the Subcommittee are not included as attachments use the following link to access this important information;

<http://www.caapts.org/owner-bedbug.aspx>

I urge members of the Advisory Council and the General Assembly to read and review the report and its attachments in its entirety to understand the true complexity of the resurgence of bed bugs in America and the challenges of finding a lasting solution.

While there are some recommendations and features of this final report that are worthy of consideration by the General Assembly, as the Subcommittee representative for the rental housing industry, I cannot concur with the entire report and respectfully dissent from agreeing with its recommendations.

Landlord Responsibilities and Tenant Accountability

The Subcommittee minutes and testimony raised additional questions and specific points about the role and responsibility of landlord and tenants. The report fails to accurately describe neither landlord's financial burden for bed bug management nor accountability for tenants who fail to cooperate with landlords. In June 2011 landlords, attended the meeting and provided written comments, at the request of the chair, which should be included in the report. In testimony provided by CAA, landlords described the cost of treating bed bug infestations as ranging from \$300 to \$1,000 per unit. Without early detection and tenant cooperation, the unit cost increases ranging from \$1,200 to \$1,800 plus the additional cost for the surrounding 6 to 10 units. In 2009 an Ohio owner reported to the Congressional Bed Bug Forum that his extermination costs were \$400,000 for a portfolio of 12,500 units. Landlords, in written comments, stated that Subcommittee report requirements placed an undue financial burden on them especially in these stressful economic times. Many have concerns about their ability to comply.

The report does state that unit inspection for infestation can be made by a non-commercial technician who has sufficient knowledge of bed bugs. In a phone conversation with chair Curt Colwell on 9/20/11 he stated that "non-commercial technician" implied inspection by a rental property owner or building employee who did not have to be certified to do the inspection. He further stated that an owner or building employees applying treatment must be minimally certified per PA 225 ILCS 235. CAA agrees with Colwell's interpretation; however it should be clarified in the final report.

Public Awareness and Education

The importance of public awareness and education is elemental to the management of infestations but this report doesn't go far enough. The report fails to identify key messages reached through consensus by the Subcommittee, specific identification of high risk activities by tenants and the general public and methods of information distribution by the Illinois Department of Health (IDPH) to the public and the media. By comparison other state task forces, advisory boards and industry experts recognize the importance of a much more proactive comprehensive approach. These include New York City, Ohio, Ohio State University, Virginia Tech, the National Pest Management Association and the National Apartment Association.

Integrated Pest Management (IPM)

A lasting solution is complex and depends on Illinois government, citizens, businesses and pest management professionals to craft reasonable solutions with an emphasis on Integrated Pest Management. The report defines IPM per 225 ILCS 235. I have included the IPM definition in the Joint Statement on Bed Bug Control in the United States from the Centers for Disease Control and Prevention (CDC) and the U.S. Environment Protection Agency (EPA) 2010 for its clarity, emphasis on economical means and diligent participation by residents;

"Integrated Pest Management is an effective and environmentally sensitive approach to pest management that relies on a combination of common-sense practices. IPM programs use current, comprehensive information on the life cycles of pests and their interaction with people and the environment. The information, in combination with available pest control methods, is used to manage pest damage by the most **economical means**, and with the least possible hazard to people, property and the environment.

Bed Bug control is most effective when an IPM approach is implemented with **diligent participation by the residents**. In multi-family housing, diligent participation is also required by building management. IPM takes advantage of all appropriate pest management options including judicious use of pesticides." (CDC 2010)

All stakeholders have reputational liability in working together to find reasonable, economical and lasting solutions. In my opinion the report does not recommend that shared responsibility.

Respectfully

Judith Roettig
Chicagoland Apartment Association
Executive Vice President

The Chicagoland Apartment Association (CAA) represents owners, developers and managers of rental housing in Metro Chicago with membership extending west to Rockford and south to Springfield. CAA members own and manage 130,000 rental units with a density of membership in Cook County; CAA is one of 170 local affiliates of the National Apartment Association representing 55,000 owner operators of 6.2 million rental homes.