

ATTACHMENT 1 TO WATER QUALITY ORDER 2022-0077-EXEC

GENERAL NPDES PERMIT FOR BIOLOGICAL AND RESIDUAL
PESTICIDE DISCHARGES FROM VECTOR CONTROL APPLICATIONS
ORDER 2016-0039-DWQ NPDES NO. CAG990004

Attachment E - NOTICE OF INTENT

**WATER QUALITY ORDER 2016-0039-DWQ
GENERAL PERMIT CAG990004**

**STATEWIDE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
PERMIT FOR BIOLOGICAL AND RESIDUAL PESTICIDE DISCHARGES
TO WATERS OF THE UNITED STATES
FROM VECTOR CONTROL APPLICATIONS**

I. NOTICE OF INTENT STATUS (see Instructions)

Mark only one item

- A. New Applicator
- B. Change of Information: WDID# 5A34AP00009
- C. Change of ownership or responsibility: WDID# _____
- D. Enrolled under Order 2011-0002-DWQ: WDID# _____

II. DISCHARGE INFORMATION

- A. Name Sacramento-Yolo Mosquito and Vector Control District
- B. Mailing Address 8631 Bond Road
- C. City Elk Grove
- D. County Sacramento
- E. State CA
- F. Zip Code 95624
- G. Contact Person Gary Goodman
- H. Email address gwgoodman@fightthebite.net
- I. Title Manager
- J. Phone 916-685-1022

III. BILLING ADDRESS (Enter information only if different from Section II above)

- A. Name _____
- B. Mailing Address _____
- C. City _____
- D. County _____
- E. State _____

ATTACHMENT 1 TO WATER QUALITY ORDER 2022-0077-EXEC

GENERAL NPDES PERMIT FOR BIOLOGICAL AND RESIDUAL
PESTICIDE DISCHARGES FROM VECTOR CONTROL APPLICATIONS
ORDER 2016-0039-DWQ NPDES NO. CAG990004

- F. Zip Code _____
- G. Email address _____
- H. Title _____
- I. Phone _____

IV. RECEIVING WATER INFORMATION

- A. Biological and residual pesticides discharge to (check all that apply)*:
 - 1. Canals, ditches, or other constructed conveyance facilities owned and controlled by Discharger.
Name of the conveyance system: _____
 - 2. Canals, ditches, or other constructed conveyance facilities owned and controlled by an entity other than the Discharger.
Owner's name: Various - See Attachment A
Name of the conveyance system: applications may be made to various conveyance systems within Sacramento and Yolo Counties
 - 3. Directly to river, lake, creek, stream, bay, ocean, etc.
Various - See Attachment A - Applications historically have been made to high water marks of Consumnes, Sacramento or American Rivers and their tributaries.
Name of water body: _____
*A map showing the affected areas for items 1 to 3 above may be included.
- B. Regional Water Quality Control Board(s) where application areas are located (REGION 1, 2, 3, 4, 5, 6, 7, 8, or 9): Region 5
(List all regions where pesticide application is proposed.)
A map showing the locations of A1-A3 in each Regional Water Board shall be included.

V. PESTICIDE APPLICATION INFORMATION

- A. Target Organisms:
 - Vector Larvae
 - Adult Vector
- B. Pesticide Used: List name, active ingredients and, if known, degradation by-products
See Attachment B

- C. Period of Application:
Start Date January 1 End Date December 31

ATTACHMENT 1 TO WATER QUALITY ORDER 2022-0077-EXEC

GENERAL NPDES PERMIT FOR BIOLOGICAL AND RESIDUAL
PESTICIDE DISCHARGES FROM VECTOR CONTROL APPLICATIONS
ORDER 2016-0039-DWQ NPDES NO. CAG990004

D. Types of Adjuvants Added by the Discharger:

VI. PESTICIDES APPLICATION PLAN

A. Has a Pesticides Application Plan been prepared?*

Yes No

If not, when will it be prepared?

*A copy of the Pesticides Application Plan shall be included with the NOI.

B. Is the applicator familiar with its contents?

Yes No

Have potentially affected governmental agencies been notified?

Yes No

*If yes, a copy of the notifications shall be attached to the NOI. See Attachment C

VIII. FEE

Have you included payment of the filing fee (for first-time enrollees only) with this submittal?

Yes No NA

IX. Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment. Additionally, I certify that the provisions of the Order, including developing and implementing a monitoring program, will be complied with."

A. Printed Name: Gary Goodman

B. Signature:  Date: 03/22/23

C. Title: Manager

X. FOR STATE WATER BOARD USE ONLY

WDID: _____ Date NOI Received: _____ Date NOI Processed: _____

ATTACHMENT 1 TO WATER QUALITY ORDER 2022-0077-EXEC

GENERAL NPDES PERMIT FOR BIOLOGICAL AND RESIDUAL
PESTICIDE DISCHARGES FROM VECTOR CONTROL APPLICATIONS
ORDER 2016-0039-DWQ NPDES NO. CAG990004

Case Handler's Initial: _____ Fee Amount Received: \$ _____ Check#: _____

Attachment B

Sacramento-Yolo MVCD NOI

V. Pesticide Application Information

List of Active Ingredients that may be used under NPDES Permit

Active Ingredient
Bacillus thuringiensis var. israelensis
Bacillus sphaericus (Lysinibacillus sphaericus)
Deltamethrin
Etofenprox
Lambda-Cyhalothrin
Malathion
Methoprene
Monomolecular Films
Naled
N-octyl Bicycloheptene Dicarboximide (MGK-264)
Petroleum Distillates
Permethrin
Piperonyl butoxide
Prallethrin
Pyrethrin
Pyriproxyfen
Resmethrin
Spinosad
Sumithrin
Temephos
Any "minimum risk category" pesticides that are FIFRA exempt and registered for use in California and used in a manner specified in 40 CFR section 152.25.

City of Davis, City Manager	Michael Webb			cmoweb@cityofdavis.org
City of Woodland, City Manager	Ken Hiatt		City Hall 300 First St., Woodland, CA 95695	jennifer.robinson@cityofwoodland.org
City of Sacramento, City Manager	Howard Chan			HChan@cityofsacramento.org
City of Winters, City Manager	Kathleen Saiguero Trepa		318 1st St. Winters, CA 95694	kathleen.trepa@cityofwinters.org
City of Folsom, City Manager	Elaine Andersen		50 Natoma St, Folsom, CA 95630	eandersen@folsom.ca.us
City of Galt	Lorenzo Hines Jr		380 Civic Dr Galt CA 95632	lhines@cityofgalt.org
City of Citrus Heights	Ashley Feeney			citymanager@citrusheights.net
City of Rancho Cordova	Micah Runner			mrunner@cityofranhocordova.org
City of Isleton	Charles Berson, P.E.		101 2nd st, Isleton CA 95641	cberson@cityofisleton.com
City of West Sacramento	Aaron Laurel		95691	aaronl@cityofwestsacramento.org
City of Elk Grove	Jason Behrmann		8401 Laguna Palms Way, Elk Grove, CA 95758	jbehrmann@elkgrovecity.org
California Dept of Water Resources	Vincent Wong		DWR - SacCounty properties	vincent.wong@water.ca.gov
California Dept of Water Resources Island wetlands	David Julian		DWR Twitchell and Sherman Island Wetlands	David.Julian@water.ca.gov
California Dept of Water Resources	Jake Aucelluzzo		DWR Yolo Flyway Farms	Jake.Aucelluzzo@water.ca.gov
Cosumnes River Preserve (CRP)	Mark Ackerman		CRP	mackerma@blm.gov
California Dept. of Fish and Wildlife Yolo Bypass Wildlife Area	Joe Hobbs		CDFW Yolo Bypass	joe.hobbs@wildlife.ca.gov
California Dept. of Fish and Wildlife	Kevin Thomas		Please forward as appropriate	kevin.thomas@wildlife.ca.gov
California Dept. of Fish and Wildlife - CRP	Eric Kleinfelter		CDFW - Sac	eric.kleinfelter@wildlife.ca.gov
USFWS, Stone Lakes National Wildlife Refuge	Bart McDermott		Stone Lakes	bart.mcdermott@fws.gov
Yolo County Flood Control and Water Conservation District	Kristen Sicke		YCFCD	ksicke@yvcfowcd.org
Sacramento Area Flood Control Agency	Richard Johnson		1007 7th Street, 7th Floor, Sacramento CA 95814	johnsonr@saccounty.net
American River Flood Control District	Timothy Kerr		165 Commerce Circle, Suite D Sacramento CA 95815	tkerr@arfcd.org
Clay Water District			P.O. Box 445, Herald CA 95638	info@sscawa.org
Galt Irrigation District			P.O. Box 445, Herald CA 95638	info@sscawa.org
Omochueme Hartnell Water District			P.O. Box 445, Herald CA 95638	info@sscawa.org
Cal Trans District 3	Amarjeet S Benipal		703 B St. Marysville, CA 95901	amarjeet.benipal@dot.ca.gov
United States Bureau of Reclamation - Delta District	Chuck Halstead		Reclamation-Delta	chalstead@usbr.gov
State of California Dept. of Parks and Recreation Capital District			7806 Folsom Auburn Rd., Folsom, CA 95630	ceqansc@parks.ca.gov
Cosumnes Community Services District	Joshua Green		Capital District 101 J St., Sacramento, CA 95814	ceqansc@parks.ca.gov
United States Department of Agriculture Natural Resources Conservation Service (NRCS)	Carlos Suarez		8820 Elk Grove Blvd, Elk Grove, CA 95624	Carlos.Suarez2@usda.gov
Department of Pesticide Regulation	Liz Neese			lneese@cdpr.ca.gov
Dixon Resource Conservation District	Kelly-Huff		707-678-1655	kelly-huff@dixonrcd.org
Florin Resource Conservation District	Bruce Kamilos		Elk Grove Water Service	bkamilos@egwd.org
Rancho Murieta CSD	Michael Fritschi			mfritschi@rmesd.com
Yolo County Resource Conservation District	Heather Nichols			Nichols@yolorcd.org
Yolo County Board of Supervisors	Oscar Villegas			oscar.villegas@yolocounty.org

Yolo County Board of Supervisors	Lucas Frerichs			Lucas.Frerichs@yolocounty.org
Yolo County Board of Supervisors	Gary Sandy			gary.sandy@yolocounty.org
Yolo County Board of Supervisors	Jim Provenza			jim.provenza@yolocounty.org
Yolo County Board of Supervisors	Angel Barajas		625 court st room 204 woodland, CA 95695	Angel.Barajas@yolocounty.org
Sacramento County Board of Supervisors	Phil Serna			SupervisorSerna@sacounty.net
Sacramento County Board of Supervisors	Patrick Kennedy			SupervisorKennedy@sacounty.net
Sacramento County Board of Supervisors	Rich Desmond			richdesmond@sacounty.net
Sacramento County Board of Supervisors	Sue Frost			SupervisorFrost@sacounty.net
Sacramento County Board of Supervisors	Patrick Hume			patrickh@sacounty.net
Sacramento Co. Agriculture Dept.	Chrisandra J. Flores			AGCOMM@sacounty.net
Yolo Co. Agriculture Dept	Humberto Izquierdo 7513 Sloughouse Rd. Elk Grove 95624		po box 211, Wilton, CA 95693-0211	Humberto.Izquierdo@yolocounty.org
Omochueme-Hartnell Water District				info@ohwd.org
Sacramento Reclamation District 3	Bruce Pisoni		P.O. Box 1011, Walnut Grove, CA 95690	recdistrict3@hotmail.com
Reclamation District 317 BALMD has oversight	Gilbert Labrie		P.O. Box 183, Walnut Grove, CA 95690	GLabrie@DCCEng.net
Reclamation District 341	Morgan Johnson Jr.		P.O. Box 875 Rio Vista, CA 94571	RD341.Shermanisland@gmail.com
Reclamation District 349			District Office P.O. Box 87, Courtland, CA 95615	SutterRD349@gmail.com
Reclamation District 369	Clarence Chu		P.O. Box 987 Walnut Grove, CA 95690	N/A
Reclamation District 407 BALMD has oversight	Gilbert Labrie		P.O. Box 183, Walnut Grove, CA 95690	GLabrie@DCCEng.net
Reclamation District 537			PO Box 980605, West sacramento, CA 95798	
Reclamation District 551	Carel Von Loben Sels		P.O. Box 123, Courtland, CA 95690	
Reclamation District 554	Bruce Pisoni		P.O. Box 984, Walnut Grove, CA 95690	
Reclamation District 556	Kevin Steward		P.O. Box 1046, Walnut Grove, CA 95690	
Reclamation District 563	Victoria Hale		P.O. Box 470, Walnut Grove, CA 95690-0470	deltabkm@ciflink.net
Reclamation District 744	Russell van Loben Sels		PO Box 517, Clarksburg, CA 95612-0517	
Reclamation District 765	Patrick Markham		8950 Cal Center Drive Suite 210, Sacramento, CA 95826	pmarkham@jacobsonmarkham.com
Reclamation District 755	D.J. Elliot		11275 State Highway 160, Courtland, CA 95615	
Reclamation District 785	James Nolan		20186 Old River Road, West Sacramento, CA 95691	jvnolan@yololaw.com
Reclamation District 787			41758 County Rd, #112, Knights Landing, CA 95645	
Reclamation District 813	Thomas Herzog		P.O. Box 557, Courtland, CA 95615	
Reclamation District 827			429 1st St, Woodland CA 95695	
Reclamation District 900	Blake Johnson		889 Denver St., West Sacramento, CA 95691	
Reclamation District 999	Thomas Slater		38563 Netherlands Rd, Clarksburg, CA 95612-5003	recdist999@gmail.com
Reclamation District 1000	Kevin L. King		1633 Garden Highway, Sacramento, CA 95833	kking@rd1000.org
Reclamation District 1002	Lana Mirko, Pierson- Lambert Vineyards, LLC.		962 Lambert Road, Courtland, CA 95615	
Reclamation District 1600	Kyle Lang		P.O. Box 655, Woodland CA 95776	langorcharDSL@aol.com
Reclamation District 1601	Rick Carter		2360 West Twitchell Island Rd, Rio Vista, CA 94571	rd1601@frontiernet.net
Reclamation District 2035	Mike Hall		45332 County Road 25, Woodland, CA 95776	mike@conawayranch.com
Reclamation District 2067 BALMD has oversight	Harvey Correia		P.O. Box 338, Walnut Grove, CA 95690 (Same As 317)	GLabrie@dccceng.net
Reclamation District 2093	Erik Vink		1107 Ninth Street, Suite 1050, Sacramento, CA 95814	
Reclamation District 2110	Brent Tadman		P.O. Box 408, Walnut Grove, CA 95690	

Reclamation District 2111	Daniel Wilson	P.O. Box 248, Walnut Grove, CA 95690	
Brannan-Andrus LM Dist	Larry Gardiner	P.O. Box 338, Walnut Grove, CA 95690	LarryL.Gardiner@gmail.com
RD 150	Warren Bogle	P.O. Box 390 Clarksburg, CA 95612	recdist150@gmail.com
RD 537	Kyle Lang	P.O. Box 655 Woodland CA 95776	langorcharadsllc@aol.com
RD 307	Peter Dwyer Jr.	P.O. Box 518, Clarksburg CA 95612	lisbon307@gmail.com
RD 108	Lewis Bair	P.O. Box 50, Grimes CA 95950	lbair@rd108.org
RD 2068	Mike Hardesty	7178 Yolano Rd, Dixon CA 95620-9621	adminrd2068@cal.net



SACRAMENTO COUNTY
8631 Bond Road
Elk Grove, CA 95624

March 2nd, 2023

(800) 429-1022
www.FIGHTtheBITE.net

Dear Agency,

The Sacramento-Yolo Mosquito and Vector Control District (District) may be making larvicide and or adulticide applications to waters of the US under your jurisdiction for mosquito reduction purposes. Applications will be posted and can be viewed on our website at www.FIGHTtheBITE.net. The District is required to notify all Government Agencies that may be affected by these applications under the requirements of the Statewide National Pollutant Discharge Elimination System (NPDES) Permit for Biological and Residual Pesticide Discharges to Waters of the United States from Vector Control Applications.

Please contact Gary Goodman at 800-429-1022 if you have additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Goodman", with a horizontal line extending to the right.

Gary Goodman
Manager
Sacramento-Yolo MVCD



SACRAMENTO COUNTY
8631 Bond Road
Elk Grove, CA 95624

(800) 429-1022
www.FIGHTtheBITE.net

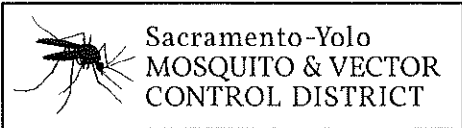
March 2nd, 2023

Notice of Intent to Apply Public Health Pesticides for Vector Control Purposes to Surface Waters and Waters of the U.S. Within Sacramento and Yolo Counties.

- The Sacramento-Yolo Mosquito & Vector Control District intends to make public health pesticide applications to, over and adjacent to constructed conveyances, surface waters and other waters of the U.S owned and controlled by an entity other than the District for vector control purposes per the requirements of the General NPDES Permit for Biological and Residual Pesticide Discharges for Vector Control Applications.
- The NPDES Permit requires listing the active ingredients of the Public Health Pesticides anticipated to be used. The current permit allows any pesticide products to be used that contain approved active ingredients, provided all pesticide label restrictions and instructions are followed. In addition, pesticides which fall under the “minimum risk” category can be used. The minimum risk pesticides have been exempted from FIFRA requirements. The following tables list the active ingredients approved for the FIFRA regulated pesticides.

Active Ingredients for larval mosquito control:

<i>Bacillus thuringiensis</i> subsp. <i>israelensis</i> (Bti)
<i>Bacillus sphaericus</i> (Bs)
Methoprene
Monomolecular Films
Petroleum Distillates
Pyriproxyfen
Spinosad
Temephos



SACRAMENTO COUNTY
 8631 Bond Road
 Elk Grove, CA 95624

(800) 429-1022
www.FIGHTtheBITE.net

Active Ingredients for adult mosquito control:

Deltamethrin
Etofenprox
Lambda-Cyhalothrin
Malathion
Naled
N-octyl bicycloheptene dicarboximide (MGK-264)
Piperonyl butoxide (PBO)
Permethrin
Prallethrin
Pyrethrin
Pyriproxyfen
Resmethrin
Sumithrin

- The purpose of the use of larvicide and adulticide pesticides containing these active ingredients is for the control of larval and adult mosquitoes to minimize the threat of mosquito-borne diseases and biting annoyances.
- The general time period for the application of the pesticides is January through December, 2023. Locations of expected use will be constructed conveyances, surface waters and other waters of the U.S. located within Sacramento and Yolo Counties.
- There are no known water use restrictions or precautions during treatment.
- Interested persons may contact the District at 1-800-429-1022 for additional information.

Gary Goodman, Manager
 Sacramento-Yolo MVCD
 8631 Bond Road
 Elk Grove, CA 95624
www.fightthebite.net

Sacramento-Yolo Mosquito & Vector Control District (District) Pesticide Application Plan (PAP):

- 1. Description of ALL target areas, if different from the water body of the target area, in to which larvicides and adulticides are being planned to be applied or may be applied to control vectors. The description shall include adjacent areas, if different from the water body of the target areas;**

Please see Agency Boundary Map. Typical and historically treated sites will include most if not all water bodies in the Yolo Bypass, areas of high water marks along the Cosumnes, Sacramento and American River corridors, intermittent creeks, and other associated waterways and surface waters that could be affected by the Districts applications.

- 2. Discussion of the factors influencing the decision to select pesticide applications for vector control;**

Decisions to use pesticides for control of mosquitoes include, but are not limited to, growth stage of mosquito, habitat that may affect efficacy of certain pesticides, inability to implement BMP (such as draining or management of water) in a timely fashion to prevent emergence, adult mosquito counts and/or virus activity that require widespread ultra low volume application, etc....

Details of these factors can be found in the Sacramento-Yolo MVCD's Mosquito and Mosquito-Borne Disease Management Plan; Appendices I and II
http://www.fightthebite.net/download/Mosquito_Management_Plan.pdf

- 3. Pesticide products or types expected to be used and if known, their degradation by-products, the method in which they are applied, and if applicable, the adjuvants and surfactants used;**

The NPDES Permit for Biological and Residual Pesticide Discharges to Waters of the U.S. from Vector Control Applications was amended to list the approved active ingredients rather than having specific products named. All pesticide label restrictions and instructions will be followed for pesticides which contain the active ingredients listed below. In addition, pesticides which fall under the "minimum risk" category may be used. The minimum risk pesticides have been exempted from FIFRA requirements. Products will be applied by truck, backpack, hand can and airplane.

Active Ingredients:

<i>Bacillus thuringiensis</i> subsp. <i>israelensis</i> (Bti)
<i>Bacillus sphaericus</i> (Bs) (<i>Lysinibacillus sphaericus</i>)
Methoprene
Monomolecular Films
Petroleum Distillates
Spinosad
Temephos
Deltamethrin
Etofenprox
Lambda-Cyhalothrin
Malathion
Naled
N-octyl bicycloheptene dicarboximide (MGK-264)
Piperonyl butoxide (PBO)
Permethrin
Prallethrin
Pyrethrin
Pyriproxyfen
Resmethrin
Sumithrin
Any minimum risk category pesticides that are FIFRA exempt and registered for use in California and used in a manner specified in 40 C.F.R. section 152.25.

4. Description of ALL the application areas and the target areas in the system that are being planned to be applied or may be applied. Provide a map showing these areas;

Any site that holds water for more than 96 hours (4 days) can produce mosquitoes. Source reduction is the District's preferred solution, and whenever possible the District works with property owners to effect long-term solutions to reduce or eliminate the need for continued applications as described in the District's Mosquito Reduction Best Management Practices Document [http://www.fightthebite.net/download/ecomangement/SYMVCD BMP Manual.pdf](http://www.fightthebite.net/download/ecomangement/SYMVCD_BMP_Manual.pdf). Mosquito breeding sources and areas that require adult mosquito control are difficult to predict from year to year based on the weather and environmental conditions variations. However, typical sources treated by this District include: permanent/semi-permanent/seasonal wetlands, rice fields, irrigated crops and associated water conveyance systems, storm drains, river seepage and creeks within aerial ULV spray blocks.

Please see Agency Boundary Map and response to Question Number 1.

5. Other control methods used (alternatives) and their limitations;

With any mosquito or other vector source, the District's first goal is to look for ways to eliminate the source, or, if that is not possible, for ways to reduce the vector potential. The most commonly used methods and their limitations are included in the District's Mosquito Reduction Best Management Practices Document [http://www.fightthebite.net/download/ecomangement/SYMVCD BMP Manual.pdf](http://www.fightthebite.net/download/ecomangement/SYMVCD_BMP_Manual.pdf). An example of an alternative is the District's use of *Gambusia affinis* in rice fields, wetlands, irrigation drains and neglected swimming pools on a yearly basis. The District's Ecological Management Department also identifies mosquito breeding sites throughout the District and works with property owners and land managers to incorporate District BMPs to reduce or eliminate mosquito breeding habitat. Sites where BMP's have been applied to include, but are not limited to, drains and ditches, rice field and wetland postponement of (re)-flooding, draining of duckclub habitat, vegetation management that provides water movement, discing, and legal abatement. These practices have been used in agricultural areas, wildlife areas (such as the Vic Fazio Wetlands) and other similar areas where appropriate and efficacious to control mosquitoes.

6. How much product is needed and how this amount was determined;

Material	Pounds	Gallons
Methoprene 20%		9
Methoprene 5%		1
Poly-w-hydroxy (agnique) Liquid		2
Poly-w-hydroxy (agnique) Granule	6	
Methoprene Pellets	1,289	
Methoorene Granule 7-day	0	
Spinosad liquid		10
Methoprene Briquets 120 day	7	
Methoprene Granule 21 day	26,574	
Soinosad oranular 7-dav	1	
Bti Granule	469,561	
5% Pvrethrin		1,365
6% Pyrethrin		
Petroleum Distillate		324
Soinosad 30 day Pellet	2	
Spinosad Briquet	50	
Spinosad Granular 30 day	14,330	
Naled		1,388
Bti Liquid		1,160
BtiWDG	2,072	

Bs Granule	1
Bti/Bs WSP	148
Bti/Bs Granule	3,491

The above totals represent estimated pesticides applications within the District boundaries to Waters of the U.S. for 2015. These amounts will change from year to year due to annual variability in required pesticide applications for mosquito control. This data is provided as an example of the products and amounts used in one year.

7. Representative monitoring locations* and the justification for selecting these locations;

Please see the MVCAC NPDES Coalition Monitoring Plan.

8. Evaluation of available BMPs to determine if there are feasible alternatives to the selected pesticide application project that could reduce potential water quality impacts:

The District's Ecological Management Department reviews post BMP implementation source pesticide application data to determine efficacy and compliance of BMP treatment. Examples that have resulted in the reduction of pesticide applications is the delay in fall flooding for duck club habitat, delay in flooding for rice field stubble breakdown, beaver dam management and discing and vegetation management on the Yolo Bypass refuge. Delays in fall habitat flooding have allowed the District to utilize single brood larvicide applications in place of higher concentrated residual larvicide applications on numerous wetlands located within the District. Discing and vegetation management performed on a sample field on the Yolo Bypass Wildlife area showed a 7 times reduction of immature mosquitoes on vegetation removal plots as compared to heavily vegetated control plots within the same field. Post beaver dam management project evaluations on two urban creeks have shown 89% and 100% reduction in larviciding acres between 2008 and 2010.

For a detailed explanation of other BMP's used by the District, please see the District's Mosquito Reduction Best Management Practices Document http://www.fightthebite.net/download/ecomanagement/SYMVCD_BMP_Manual.Rdf.

9. Description of the BMPs to be implemented. The BMP's shall include, at the minimum:

a. measures to prevent pesticide spill;

District staff monitors application equipment on a daily basis to ensure it remains in proper working order. Spill mitigation devices are placed in all spray vehicles and pesticide storage areas to respond to spills. Employees are trained on spill prevention and response annually.

b. measures to ensure that only a minimum and consistent amount is used;

Spray equipment is calibrated each year and is a part of the MOU with CDPH. However, the pesticide label and associated registration by USEPA and CDPR are the authority of how much product can be legally applied to control the target

c. a plan to educate Coalition's or Discharger's staff and pesticide applicator on any potential adverse effects to waters if the U.S. from the pesticide application;

Applicators are required to complete pesticide training on an annual basis. Records are kept of these training sessions for review by the local agricultural commissioner and/or CDPH. Employees certified by the CDPH must perform at least 20 hours of Continuing Education units to maintain their certification.

d. descriptions of specific BMPs for each spray mode, e.g. aerial spray, truck spray, hand spray, etc.;

The District will calibrate truck and hand larviciding equipment each year to meet application specifications. Supervisors review spray records daily to ensure appropriate amounts of material are being used. ULV equipment is calibrated for output and droplet size to meet label requirements. Aerial larviciding equipment is calibrated by the Contractor. Aerial adulticide equipment is calibrated at a minimum of once per year and as needed based on efficacy results and total amount of product used per event. Droplet sizes are monitored by the District to ensure droplets meet label requirements. Airplanes used in ULV applications are equipped with advanced guidance and drift management equipment to ensure the best available technology is being used to place product in the intended spray area.

e. descriptions of specific BMPs for each pesticide product used;

Please see District's Mosquito Reduction Best Management Practices Document

http://www.fightthebite.net/download/ecomagement/SYMVCD_BMP_Manual.pdf

- f. descriptions of specific BMPs for each type of environmental setting (agriculture, urban, and wetlands).**

Please see District's Mosquito Reduction Best Management Practices Document

http://www.fightthebite.net/download/ecomangement/SYMVCD_BMP_Manual.pdf

- 10. Identification of the problem. Prior to first pesticide application covered under this General Permit that will result in a discharge of biological and residual pesticides to waters of the U.S., and at least once each calendar year thereafter prior to the first pesticide application for that calendar year, the Discharger must do the following for each vector management area:**

The District's BMPs are described in a flow chart that can be found in the in Districts Mosquito Reduction Best Management Practices Document and the District's Mosquito and Mosquito- Borne Disease Management Plan.; Appendices I and II

http://www.fightthebite.net/download/Mosquito_Management_Plan.pdf AND
http://www.fightthebite.net/download/ecomangement/SYMVCD_BMP_Manual.pdf

- a. If applicable, establish densities for larval and adult vector populations to serve as action threshold(s) for implementing pest management strategies;**

Please see Sacramento-Yolo MVCD's Mosquito and Mosquito-Borne Disease Management Plan; Appendices I and II

- b. Identify target vector species to develop species-specific pest management strategies based on developmental and behavioral considerations for each species;**

Please see Sacramento-Yolo MVCD's Mosquito and Mosquito-Borne Disease Management Plan; Appendices I and II

- c. Identify known breeding areas for source reduction, larval control program, and habitat management: and**

Any site that holds water for more than 96 hours (4 days) can produce mosquitoes. Source reduction is the District's preferred solution, and whenever possible the District works with property owners to implement long-term solutions to reduce or eliminate the need for continued applications as described in the District's Mosquito Reduction Best Management Practices Document.

d. Analyze existing surveillance data to identify new or unidentified sources of vector problems as well as areas that have recurring vector problems.

This information is located in the Sacramento-Yolo MVCD's Mosquito and Mosquito-Borne Disease Management Plan, Appendices I and II. The District utilizes mosquito surveillance traps on a weekly basis to obtain appropriate mosquito abundance and disease activity data to guide control decisions.

11. Examination of Alternatives. Dischargers shall continue to examine alternatives to pesticide use in order to reduce the need for applying larvicides that contain temephos and for spraying adulticides. Such methods include:

a. Evaluating the following management options, in which the impact to water quality, impact to non-target organisms, vector resistance, feasibility, and cost effectiveness should be considered:

- No action
- Prevention
- Mechanical or physical methods
- Cultural methods
- Biological control agents
- Pesticides

If there are no alternatives to pesticides, dischargers shall use the least amount of pesticide necessary to effectively control the target pest.

Implementing preferred alternatives depends on a variety of factors including availability of agency resources, cooperation with stakeholders, coordination with other regulatory agencies, and the anticipated efficacy of the alternative. If a pesticide-free alternative does not sufficiently reduce the risk to public health, pesticides are considered, beginning with the least amount necessary to effectively control the target vector.

b. Applying pesticides only when vectors are present at a level that will constitute a nuisance

This is described in the District's existing integrated vector management (IVM) program, as well as the practices described in our Mosquito and Mosquito-Borne Disease Management Plan and Mosquito Reduction Best Management Practices Document.

http://www.fightthebite.net/download/Mosquito_Management_Plan.pdf

http://www.fightthebite.net/download/ecomagement/SYMVCD_BMP_Manual.pdf

In addition, the District may utilize legal abatement authority to mitigate mosquito production.

12. Correct Use of Pesticides

Coalition's or Discharger's use of pesticides must ensure that all reasonable precautions are taken to minimize the impacts caused by pesticide applications. Reasonable precautions include using the right spraying techniques and equipment, taking account of weather conditions and the need to protect the environment.

This is an existing practice of the District, and is required to comply with the Department of Pesticide Regulation's (DPR) requirements and the terms of our California Department of Public Health (CDPH) Cooperative Agreement. All pesticide applicators receive annual safety and spill training in addition to their regular continuing education.

13. Website for Public Notice

www.fightthebite.net

References:

Mosquito and Mosquito-Borne Disease Management Plan. 2005. Sacramento-Yolo Mosquito and Vector Control District. Download from <http://www.fightthebite.net/mosquito-management-plan/>

Mosquito Reduction Best Management Practices. Available from Sacramento-Yolo Mosquito & Vector Control District, by download from http://www.fightthebite.net/download/ecomangement/SYMVCD_BMP_Manual.pdf or calling 800-429-1022

MVCAC NPDES Coalition Monitoring Plan.