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# 5 A31NP00017

C. Change of ownership or responsibility: WDID# _____

D. Enrolled under Order 2011-0002-DWQ: WDID# _____

II. DISCHARGE INFORMATION

A. Name Placer Mosquito and Vector Control District

B. Mailing Address 2021 Opportunity Drive

C. City Roseville

D. County Placer

E. State California

F. Zip Code 95678

G. Contact Person Joel Buettner

H. Email address joelb@placermosquito.org

I. Title General Manager

J. Phone 916-380-5444

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

A. Name _____

B. Mailing Address _____

C. City _____

D. County _____

E. State _____

D. Types of Adjuvants Added by the Discharger:

VI. PESTICIDES APPLICATION PLAN

A. Has a Pesticides Application Plan been prepared?*

Yes X No

See attachement C

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 X No

Have potentially affected governmental agencies been notified?

Yes X No

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

See attachments D and E

VIII. FEE

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

Yes No NA X

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: Joel Buettner

B. Signature: _____ Date: February 27, 2025

C. Title: General Manager

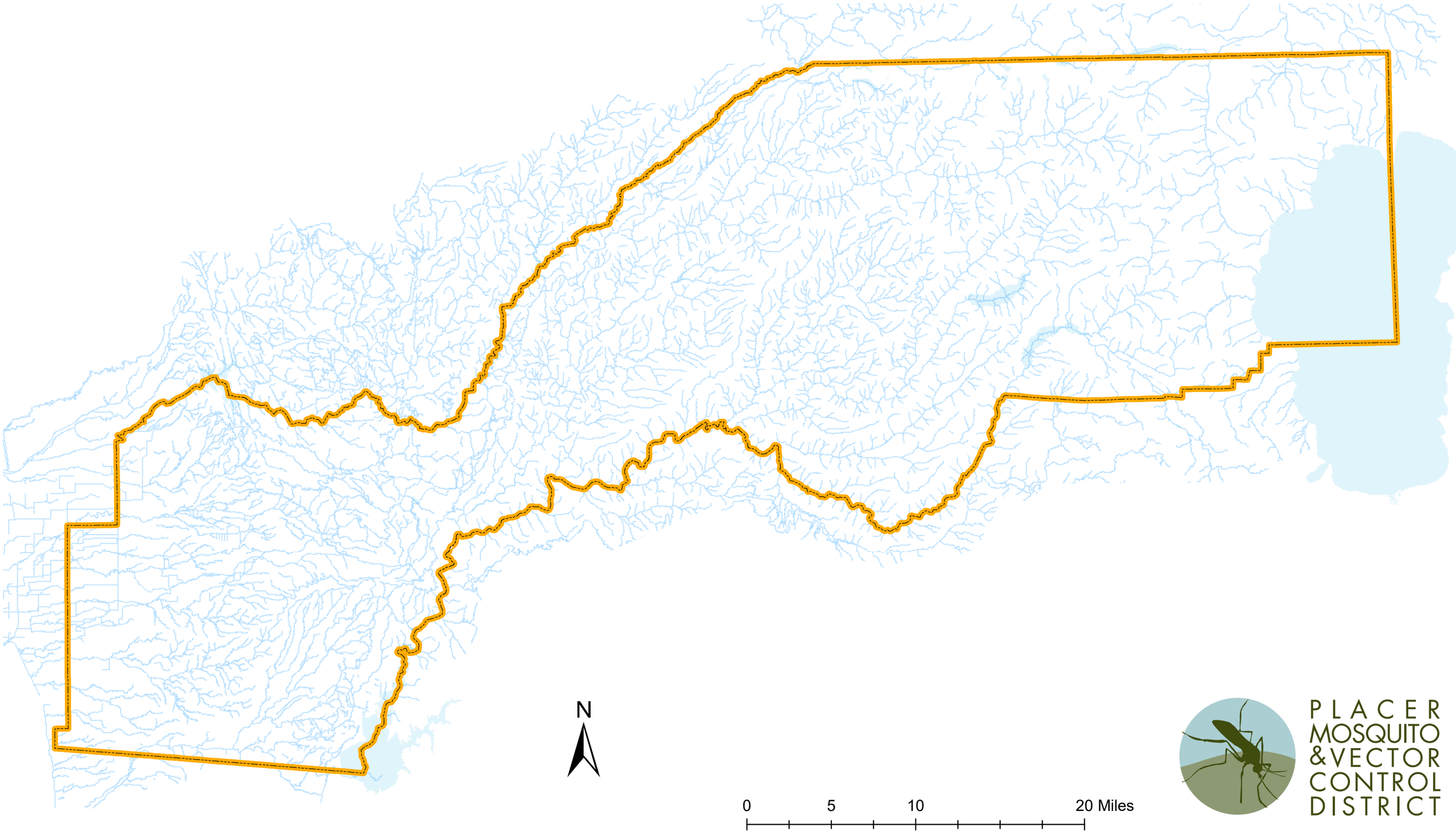
X. FOR STATE WATER BOARD USE ONLY

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

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 A



PLACER MOSQUITO & VECTOR CONTROL DISTRICT

Attachment B

Placer Mosquito and Vector Control District NOI

V. Pesticide Application Information

List of Active Ingredients that may be used under the NPDES Permit

Active Ingredient
Bacillus thuringiensis var. israelensis
Bacillus sphaericus (Lysinbacillus 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 C.F.R. section 152.25.

Attachment C

Placer Mosquito and Vector Control District
Pesticide Application Plan 2025

The Discharger shall develop a Pesticides Application Plan (PAP) that contains the following elements:

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**;

   See attached map

2. **Discussion of the factors influencing the decision to select pesticide applications for mosquito control;**
   Please see the Best Management Practices for Mosquito Control in California.

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;**
   Please see Attachments E and F within NPDES Permit for Biological and Residual Pesticide Discharges to Waters of the U.S. for Vector Control Applications. Products may be applied by hand, truck, backpack, hand can, helicopter, or aircraft according to label directions.

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;**
   In areas where source reduction and biological control are not effective or feasible, then public health pesticides are used in the most targeted manner allowed. Treatment areas vary as densities or mosquitoes and West Nile virus vary.

5. **Other control methods used (alternatives) and their limitations;**
   With any source of mosquitoes or other vectors, the Placer Mosquito and Vector Control District's first goal is to look for ways to eliminate the source, or if that is not possible, for ways to reduce the potential for vectors. The most commonly used methods and their limitations are included in the Best Management Practices for Mosquito Control in California.

   Specific methods used by the agency include stocking mosquito fish (*Gambusia affinis*), educating residents that mosquitoes develop in standing water and encouraging them to

remove sources of standing water on their property, and working with property owners to find long-term water management strategies that meet their needs while minimizing the need for public health pesticide applications.

6. **How much product is needed and how this amount was determined;**
   The need to apply product is determined by many factors including but not limited to: mosquito abundance, disease surveillance, risk to the public, life stage of the mosquito, mosquito species, time of year, and environmental condition. Actual use varies annually depending on mosquito abundance. The pesticide amounts presented below were the amounts reported on the Placer Mosquito and Vector Control District's 2025 NPDES report. Other public health pesticides in addition to those listed below may be used as part of the agency's best management practices. 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.

Active Ingredient and Formulation	Amount	
Pyrethrin 6% +PBO	162.83	gal
Pyrethrins 5%	0.22	gal
Deltamethrin 2%	9.16	gal
Lambda Cyhalothrin 9.7%	0.01	gal
Naled	372.50	gal
Bti granule	1866	lb
Bti + Bsph granule	379.68	lb
Bti + Bsph water soluble pouch	113.00	ea
Bti + methoprene granule	369.24	lb
Methoprene briquettes	29.00	ea
Petroleum distillates	1.48	gal
Monomolecular films	3.05	gal

7. **Representative monitoring locations* and the justification for selecting these monitoring 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; and**
   The District evaluates specific mosquito development areas for management through non-chemical means. Please see the Best Management Practices for Mosquito Control in California.

9. **Description of the BMPs to be implemented. The BMPs shall include at a minimum:**
   The Placer Mosquito and Vector Control District's BMPs are described in the Best

Management Practices for Mosquito Control in California and in the California Mosquito-borne Virus Surveillance and Response Plan. Specific elements have been highlighted below under items a-f.

a. **measures to prevent pesticide spill;**
   All pesticide applicators receive annual spill prevention and response training. Agency employees ensure daily that application equipment is in proper working order. Spill mitigation devices are placed in all vehicles and pesticide storage areas.

b. **measures to ensure that only a minimum and consistent amount is used**
   Application equipment is calibrated at least annually as required by the Department of Pesticide Regulations (DPR) and the terms of a cooperative agreement with the California Department of Public Health (CDPH).

c. **a plan to educate Coalition's or Discharger's staff and pesticide applicator on any potential adverse effects to waters of the U.S. from the pesticide application;**
   This is included in our pesticide applicator's annual pesticide application and safety training, continuing education programs, and/or regional NPDES Permit training programs.

d. **descriptions of specific BMPs for each application mode, e.g. aerial, truck, hand, etc.;**
   The Placer Mosquito and Vector Control District calibrates truck-mounted and handheld larviciding equipment each year to meet application specifications. Supervisors review application records daily to ensure appropriate amounts of material are being used. Ultra-low volume (ULV) application equipment is calibrated for output and droplet size to meet label requirements. Aerial larviciding equipment is generally calibrated by the Contractor and verified by the District. Aerial adulticide equipment is calibrated at least annually and droplet size is monitored by the District to ensure droplets meet label requirements. Aircraft 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 area.

e. **descriptions of specific BMPs for each pesticide product used; and**
   Please see the District's Integrated Vector Management Guidelines for Mosquitoes for how and when mosquito control interventions are implemented.

f. **descriptions of specific BMPs for each type of environmental setting (agricultural, urban, and wetland).**
   Please see the Best Management Practices for Mosquito Control in California.

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 US, 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:

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

The Placer Mosquito and Vector Control District staff only applies pesticides to sources of mosquitoes that may threaten public health or quality of life. The presence of any mosquito may necessitate treatment, however higher thresholds may be applied depending on the agency's resources, disease activity, surveillance data, or local needs. Treatment thresholds are based on a combination of one or more of the following criteria, and are included in the District's Integrated Vector Management Guidelines for Mosquitoes:

- Mosquito species present
- Mosquito stage of development
- Pest, nuisance, or disease potential
- Disease activity
- Mosquito abundance
- Flight range
- Proximity to populated areas
- Size of source
- Presence/absence of natural enemies or predators
- Presence of sensitive/endangered species or habitats.

b. Identify target vector species to develop species-specific pest management strategies based on developmental and behavioral considerations for each species; Please see the District's Integrated Vector Management Guidelines for Mosquitoes, Best Management Practices for Mosquito Control in California and the California Mosquito-borne Virus Surveillance and Response Plan.

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

Any site that holds water for more than 72 to 96 hours (3 - 4 days) can produce mosquitoes depending on weather and other environmental factors. Source reduction is the agency'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 pesticide applications as described in the District's Integrated Vector Management Guidelines for Mosquitoes and the Best Management Practices for Mosquito Control in California.

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

This is included in the Best Management Practices for Mosquito Control in California and the California Mosquito-borne Virus Surveillance and Response Plan that the agency uses. The Placer Mosquito and Vector Control District continually collects adult and larval mosquito surveillance data, dead bird reports, and sentinel chicken test results, and monitors regional mosquito-borne disease activity detected in humans, horses, birds, and/or other animals, and uses these data to help guide mosquito control activities.

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.

The Placer Mosquito and Vector Control District's uses the principles and practices of Integrated Vector Management (IVM) as described on pages 26 and 27 of the Best Management Practices for Mosquito Control in California, and further defined in the District's Integrated Vector Management Guidelines for Mosquitoes. As stated in item #10 above, locations where vectors may exist are assessed, and the potential for using alternatives to pesticides is determined on a case-by-case basis. Commonly considered alternatives include: 1) Eliminate artificial sources of standing water; 2) Ensure temporary sources of surface water drain within four days (96 hours) to prevent adult mosquitoes from developing; 3) Control plant growth in ponds, ditches, and shallow wetlands; 4) Design facilities and water conveyance and/or holding structures to minimize the potential for producing mosquitoes; and 5) Use appropriate biological control methods that are available. Additional alternatives to using pesticides for managing mosquitoes are listed on pages 4-19 of the Best Management Practices for Mosquito Control in California.

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.

Please see the District's Integrated Vector Management Guidelines for Mosquitoes, which identifies when the practices described in the California Mosquito-borne Virus Surveillance and Response Plan and Best Management Practices for Mosquito Control in California are implemented operationally.

A "nuisance" is specifically defined in California Health and Safety Code (HSC) §2002(j). This definition allows vector control agencies to address situations where even a low number of vectors may pose a substantial threat to public health and quality of life. In practice, the definition of a "nuisance" is generally only part of a decision to apply pesticides to areas covered under this permit. As summarized in the California Mosquito-borne Virus Surveillance and Response Plan, the overall risk to the public when vectors and/or vector-borne disease are present is used to select an available and appropriate material, rate, and application method to address that risk in the context of our IVM program.

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 Placer Mosquito and Vector Control 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 to maintain Vector Control Technician certification.

13. If applicable, specify a website where public notices, required in Section VIII.B, may be found.

www.placermosquito.org

References

Placer Mosquito and Vector Control District's Integrated Vector Management Guidelines for Mosquitoes Available on-line at https://placermosquito.org/wp-content/uploads/2020/11/IVM-Guidelines-for-Mosquitoes-2015.pdf or by calling the Placer Mosquito and Vector Control District at (916) 380-5444.

Best Management Practices for Mosquito Control in California. 2010. Available by download from the California Department of Public Health—Vector-Borne Disease Section at https://westnile.ca.gov/resources_reports?resource_category_id=2. Copies may be also requested by calling the California Department of Public

Health—Vector-Borne Disease Section at (916) 552-9730 or the Placer Mosquito and Vector Control District at (916) 380-5444.

California Mosquito-borne Virus Surveillance and Response Plan. 2010. [Note: this document is updated annually by CDPH]. . Available by download from the California Department of Public Health—Vector-Borne Disease Section at https://westnile.ca.gov/resources_reports?resource_category_id=9. Copies may be also requested by calling the California Department of Public Health—Vector-Borne Disease Section at (916) 552-9730 or the Placer Mosquito and Vector Control District at (916) 380-5444.

MVCAC NPDES Coalition Monitoring Plan. 2011.

Attachment D

PLACER MOSQUITO & VECTOR CONTROL DISTRICT

2021 Opportunity Drive
Roseville, CA 95678
(916) 380-5444
placermosquito.org

January 16, 2025

RE: NOTICE OF PESTICIDE APPLICATION

Since November 1, 2011, the Placer Mosquito and Vector Control District (District) has been operating under 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 (WATER QUALITY ORDER NO. 2011-0002-DWQ).**

Under this permit, the District is required to annually notify potentially affected government agencies of the following:

1. The District intends to apply one or more public health pesticides to or near areas under your agency's jurisdiction, if necessary, to limit risks to public health posed by mosquitoes and mosquito-borne diseases such as West Nile virus.

2. The pesticides that may be applied are listed on Attachment A and includes mosquito larvicides and adulticides.

3. The purpose of any application will be to reduce mosquito abundance and/or mosquito-borne disease levels detected in the application area as part of the District's integrated pest management program.

4. Applications may occur between January 1 and December 31, 2025, at appropriate locations within Placer County.

5. There are no water use restrictions or precautions during treatment.

For more information, please visit placermosquito.org or call (916) 380-5444.

Sincerely,

Joel Buettner
General Manager

Attachment A: List of Permitted Adulticide and Larvicide Products

Attachment E - Potentially Affected Government Agencies			
Agency Name	**Contact Name**	**Title**	**Email**
Placer County Resource and Conservation District	Sarah Jones	Executive Director	sarah@placerrcd.org
CA Dept. of Fish and Wildlife (Region 2)	Morgan Kilgour	North Central Regional Manager	R2Info@wildlife.ca.gov
U.S. Fish and Wildlife Services	Paul Souza	Regional Director, Pacific Southwest	paul_souza@fws.gov
Nevada Irrigation District	Jennifer Hanson	General Manager	admindepartment@nidwater.com
Placer County Water Agency	Andy Fecko	General Manager	generalmanager@pcwa.net
Tahoe Regional Planning Agency	Julie Regan	Executive Director	jregan@trpa.gov
Tahoe City PUD	Sean Barclay	General Manager	sbarclay@tcpud.org
North Tahoe Public Utilities District	Bradley A. Johnson	General Manager	bjohnson@ntpud.org
Placer County Office of Education	Gayle Garbolino-Mojica	Superintendent	ggarbolino@placercoe.k12.ca.us
Placer County Board of Supervisors	Megan Wood	Clerk of the Board of Supervisors	mwood@placer.ca.gov
Placer County, Planning Services Division	Christopher Pahule	Planning Director	cpahule@placer.ca.gov
Placer County Health and Human Services	Dr. Rob Oldham	Interim Health Officer and Director of HHS	roldham@placer.ca.gov
Placer County Health and Human Services	Michael Romero	Deputy Director	mromero@placer.ca.gov
Placer County Health and Human Services	Wesley Nicks	Director of Environmental Health	wnicks@placer.ca.gov
Placer County Agricultural Commission	Joshua Huntsinger	Commissioner/Sealer of Weights and Measures	placerag@placer.ca.gov
Foresthill Forum District 5	Lindsay Romack	District Director	lromack@placer.ca.gov
Granite Bay MAC District 4	Joseph Michael Spelis	District Director	jspelis@placer.ca.gov
Horseshoe Bar-Penryn MAC District 3	Beverly Roberts	District 3, District Aide	BRoberts@placer.ca.gov
Meadow Vista MAC District 5	Lindsay Romack	District Director	lromack@placer.ca.gov
Newcastle Ophir MAC District 3	Beverly Roberts	District 3, District Aide	BRoberts@placer.ca.gov
North Auburn MAC District 3	Beverly Roberts	District 3, District Aide	BRoberts@placer.ca.gov
Donner Summit MAC District 5	Lindsay Romack	District Director	lromack@placer.ca.gov
North Tahoe Regional Advisory Council District 5	Lindsay Romack	District Director	lromack@placer.ca.gov
Rural Lincoln MAC District 2	Christina Faria	District 2 Director	cfaria@placer.ca.gov
Sheridan MAC District 2	Christina Faria	District 2 Director	cfaria@placer.ca.gov
Squaw Valley MAC	Lindsay Romack	District Director	lromack@placer.ca.gov
Weimar Applegate Colfax MAC	Lindsay Romack	District Director	lromack@placer.ca.gov
West Placer MAC District 1	Landon Wolf	District Director	LandonWolf@placer.ca.gov
District 3	Cristina Rivera	Chief of Staff	crivera@placer.ca.gov
District 5	Sophie Fox	Chief of Staff	sfox@placer.ca.gov
City of Auburn	Sean Rabe	City Manager	srabe@auburn.ca.gov
City of Colfax	Ron Walker	City Manager	city.manager@colfax-ca.gov
City of Lincoln	Sean Scully	City Manager	sean.scully@lincolnca.gov
City of Roseville	Dominick Casey	City Manager	citymanager@roseville.ca.us
City of Rocklin	Aly Zimmermann	City Manager	alyz@rocklin.ca.us
Town of Loomis	Wes Heathcock	Town Manager	wheathcock@loomis.ca.gov
Placer Mosquito and Vector Control District	Joel Buettner	District Manager	joelb@placermosquito.org
Placer Mosquito and Vector Control District	Jake Hartle	Assistant Manager	jakeh@placermosquito.org