



Compton Creek Mosquito Abatement District  
1224 South Santa Fe Ave. • Compton, CA 90221  
Tel. / Fax: (310) 933-5321 • www.comptoncreekmad.org  
e-mail: info@comptoncreekmad.org or comptoncreekmad@earthlink.net

March 9, 2016

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General Manager

Mitchel R. Weinbaum

Ariana Villanueva  
Division of Water Quality  
c/o NPDES Wastewater Unit  
State Water Resources Control Board  
1001 I Street, 15<sup>th</sup> floor  
Sacramento, CA 95814

Re: Order # 2011-0002-DWQ NPDES #CAG 990004

Dear Ms. Villanueva,

Included in this packet from the Compton Creek Mosquito Abatement District are the Notice Of Intent and our Pesticide Application Plan for our NPDES Permit.

If you have any questions regarding this documentation, please feel free to contact our office.

Sincerely,

Mitchel R. Weinbaum

General Manager

RECEIVED  
MAR 14 2016  
DIVISION OF WATER QUALITY

*The District includes the communities of:*

Compton, East Rancho Dominguez, Enterprise, Mona Park, North Long Beach,  
Rosewood, West Rancho Dominguez and Willowbrook

**ATTACHMENT G – NOTICE OF INTENT**

2016-xxxx

**WATER QUALITY ORDER NO. ~~2011-0002~~-DWQ  
GENERAL PERMIT NO. CAG 990004**

**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# \_\_\_\_\_  
 C. Change of ownership or responsibility: WDID# \_\_\_\_\_

**II. DISCHARGER INFORMATION**

A. Name COMPTON CREEK MOSQUITO ABATEMENT DISTRICT			
B. Mailing Address 1224 S. SANTA FE Ave			
C. City COMPTON	D. County LOS ANGELES	E. State CA	F. Zip Code 90221
G. Contact Person MITCHEL R WEINBAUM	H. Email address MWEINBAUM@COMPTONCREEK.MAD.ORG	I. Title GENERAL MANAGER	J. Phone (310) 933-5321

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

A. Name			
B. Mailing Address			
C. City	D. County	E. State	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: \_\_\_\_\_  
Name of the conveyance system: \_\_\_\_\_
3. Directly to river, lake, creek, stream, bay, ocean, etc.  
 Name of water body: COMPTON CREEK, LOS ANGELES RIVER, PACIFIC OCEAN

\* 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 4  
(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. Pesticides Used: List name, active ingredients and, if known, degradation by-products  
SEE ATTACHMENT B

C. Period of Application: Start Date Jan 1 End Date Dec 31

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 PAP shall be included with the NOI.

B. Is the applicator familiar with its contents?

Yes  No

VII. NOTIFICATION

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 General Permit, including developing and implementing a monitoring program, will be complied with."

A. Printed Name: MITCHEL R. WEINBAUM

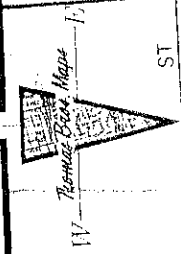
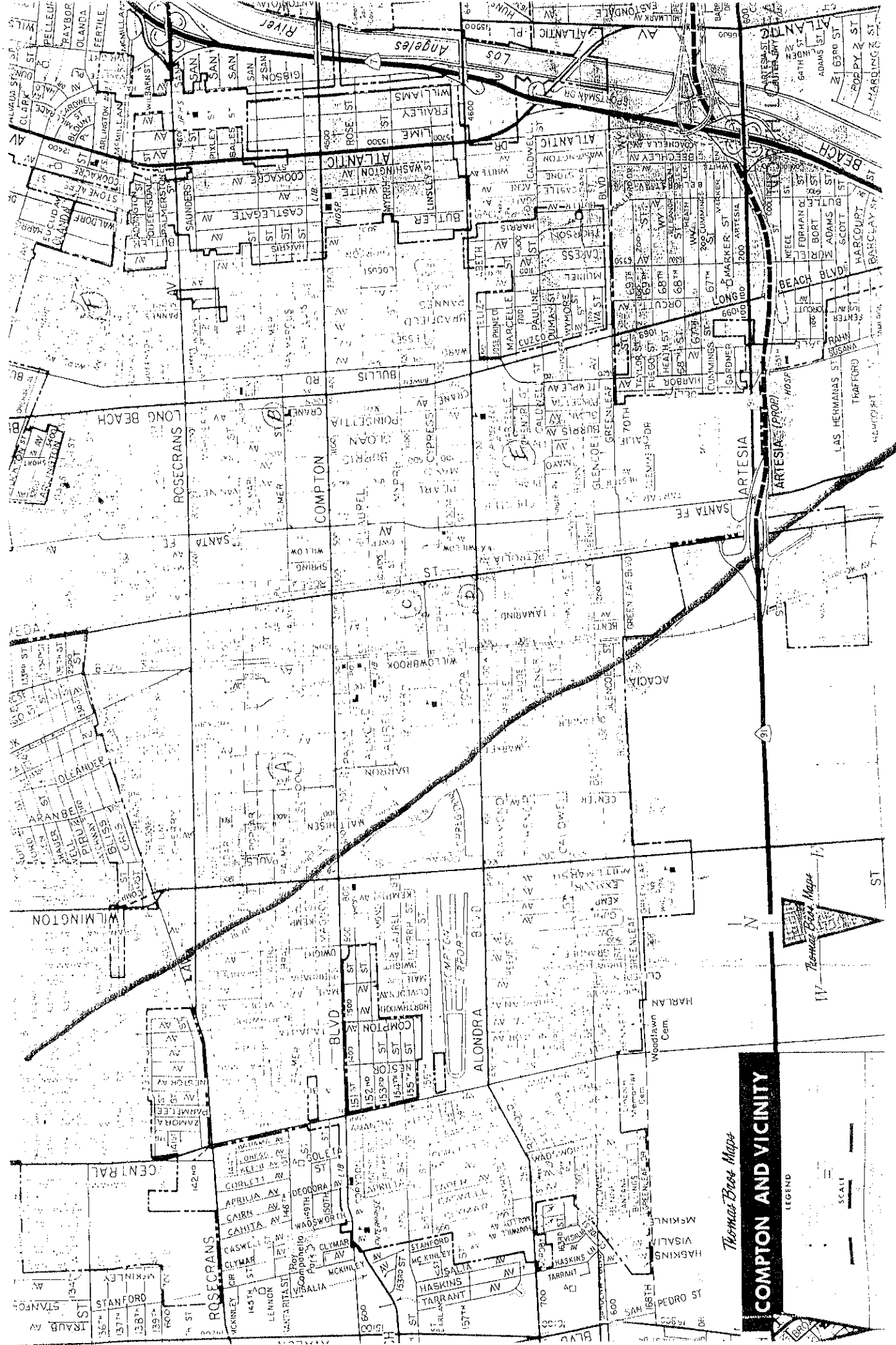
B. Signature: *Mitchel R Weinbaum*

Date: 3/5/16

C. Title: GENERAL MANAGER

X. FOR STATE WATER BOARD USE ONLY

WDID:	Date NOI Received:	Date NOI Processed:
Case Handler's Initial:	Fee Amount Received: \$	Check #:



**COMPTON AND VICINITY**

*Thomas Cook Maps*

LEGEND

SCALE

Figure 1

The non-shaded areas encompass the District. However, in fact, this District covers the entire areas from:

West to Avalon Blvd  
North to El Segundo Blvd  
East to the 710 Freeway  
South to the 91 Freeway

Also, as per the coordinates on the map provided the area:

The area from 'LT' going east to the 710 Freeway  
The area '52' going south, running west along the 710 Freeway to the end of the page

**Attachment B**

**Compton Creek Mosquito abatement District**

**V. Pesticide Application Information**

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

ACTIVE INGREDIENTS

- *Bacillus thuringiensis* subsp. *Israelensis* (Bti)
- *Bacillus Sphaericus* (Bs) (*Lysinibacillus Sphaericus*)
- Methoprene
- Monomolecular Films
- Petroleum Distillates
- Spinosad
- Temephos
- Deltamethrin
- Etofenprox
- Lamda-Cyhalothrin
- Malathion
- Naled
- N-octyl bicycloheptene dicarboximide (MGK-264)
- Piperonyl butoxide (PBO)
- Permethrin
- Prallethrin
- Pyrethrin
- Resmethrin
- Sumitrin
- 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  
NPDES Government Contact List**

City of Compton	City Manager	<a href="mailto:contactcm@comptoncity.org">contactcm@comptoncity.org</a>
City of Long Beach	City Manager	333 W. Ocean Blvd. Long Beach, CA 90802
County of Los Angeles	Los Angeles County Board of Supervisors	383 Hall of Administration LA, CA 90012
Los Angeles County Flood Control	Ed Teran	5525 Imperial Highway South Gate, CA 90280
US Army Corps of Engineers	Kelly Howard	915 Wilshire Blvd. LA, CA 90017
United States Fish & Wildlife		USFWS 2800 Cottage Way, Rm W-2605 Sacramento, CA 95825
CA Dept of Fish & Wildlife	Ed Pert	3883 Ruffin Rd. San Diego, CA 92123
CA Dept of Water Resources	Ed Wilson	<a href="mailto:ewilson@water.ca.gov">ewilson@water.ca.gov</a>
Dept. of Pesticide Regulations	Liz Neese	<a href="mailto:lneese@cdpr.ca.gov">lneese@cdpr.ca.gov</a>
Los Angeles County Agricultural Commissioner	Greg Creekmur	12300 Lower Azuza Rd Arcadia, CA 91006





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e-mail: [info@comptoncreekmad.org](mailto:info@comptoncreekmad.org) or [comptoncreekmad@earthlink.net](mailto:comptoncreekmad@earthlink.net)

February 1, 2016

TRUSTEES:

*President*

Micah Ali

*County of Los Angeles*

*Vice President*

Yvonne Arceneaux

*City of Compton*

*Board Secretary*

Kathrine Guzman

*City of Long Beach*

*Trustee*

Margaret D. Comer

*County of Los Angeles*

*Trustee*

Jacquelyn M. Horton

*County of Los Angeles*

*General Manager*

Mitchel R. Weinbaum

Dear Agency,

The Compton Creek Mosquito Abatement District (District) may be making larvicide and or adulticide applications to the waters of the US under your jurisdiction for mosquito reduction purposes. Applications will be posted and can be viewed on our website at [www.comptoncreekmad.org](http://www.comptoncreekmad.org). 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 Mosquito Control Applications.

Please contact Mitchel R. Weinbaum at (310) 933-5321 if you have any additional questions.

Sincerely,

Mitchel R. Weinbaum

General Manager

Compton Creek MAD

*The District includes the communities of:*  
Compton, East Rancho Dominguez, Enterprise, Mona Park, North Long Beach,  
Rosewood, West Rancho Dominguez and Willowbrook

March 1<sup>st</sup>, 2016

**Notice of Intent to Apply Public Health Pesticides for Mosquito Control Purposes to Surface Waters and Waters of the U.S. within the Boundaries of the Compton Creek Mosquito Abatement District.**

- The Compton Creek Mosquito Abatement 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 mosquito control purposes per the requirements of the General NPDES Permit for Biological and Residual Pesticides Discharges for Mosquito Control Applications.
- The NPDES Permit requirements for listing of the Public Health Pesticides anticipated to be used were modified from the previous permit, to the new permit which will be issued in 2016. The newer requirements specify that any pesticide product can 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:

- *Bacillus thuringiensis* subsp. *Israelensis* (Bti)
- *Bacillus Sphaericus* (Bs)
- Methoprene
- Monomolecular Films
- Petroleum Distillates
- Spinosad
- Temephos

Active ingredients for adult mosquito control

- Deltamethrin
- Etofenprox
- Lambda-Cyhalothrin
- Malathion
- Naled
- N-octyl bicycloheptene dicarboximide (MGK-264)
- Piperonyl butoxide (PBO)
- Permethrin

- Prallethrin
  - Pyrethrin
  - 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 2016. Locations of expected use will be constructed conveyances, surface waters and other waters of the U.S. located with the boundaries of the Compton Creek Mosquito Abatement District
  - There are no known water use restrictions or precautions during treatment.
  - Interested persons may contact the District at (310) 933-5321 for additional information.

Mitchel R. Weinbaum  
General Manager  
Compton Creek Mosquito Abatement District  
1224 S. Santa Fe Ave.  
Compton, CA 90221  
[comptoncreekmad.org](http://comptoncreekmad.org)

**COMPTON CREEK MOSQUITO ABATEMENT DISTRICT  
1224 S. SANTA FE AVENUE  
COMPTON, CA 90221**

**PHONE AND FAX (310) 933-5321  
[WWW.COMPTONCREEKMAD.ORG](http://WWW.COMPTONCREEKMAD.ORG)**

**PESTICIDE APPLICATION PLAN  
(PAP)**

**FEBRUARY 2016**

## ELEMENTS OF THE PESTICIDE APPLICATION PLAN (PAP)<sup>1</sup>

- 1. Description of ALL target areas, if different from the water body of the target area, in 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.**

The Compton Creek Mosquito Abatement District (CCMAD or the District) consists of 12½ square miles in the southern portion of Los Angeles County, consists of the City of Compton, the northwest portion of North Long Beach and unincorporated areas of Los Angeles County adjacent to the District and is completely surrounded by Greater Los Angeles County Vector Control District. The Compton Creek is the principle water of which larvicides and adulticides may be applied to control mosquitoes. The Los Angeles River is near to the District and could be affected by such applications.

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

CCMAD uses the principles and practices of Integrated Vector Management (IVM) as described in *Best Management Practices for Mosquito Control in California* (Appendix A, pp. 26-27). When IVM or IPM techniques, source elimination, source reduction and biological control methods have become exhausted, chemicals means are used to reduce mosquito populations. Other factors that influence the decision to select pesticide applications include larval stage (instar), number of larvae, number of predators, presence of mosquito-borne disease in the region, abundance of mosquito species that vector the disease, positive dead bird information from West Nile virus (WNV), climatic influences, presence of listed species, specialized habitats and citizen based service requests.

- 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 Pesticides 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

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<sup>1</sup> *Statewide National Pollutant Discharge Elimination System (NPDES) Permit (Permit) for Biological and Residual Pesticide Discharges to Waters of the United States from Vector Control Applications.* Water Quality Order No. 2011-0002-DWQ. General Permit No. CAG990004. VIII: C (16-18). State Water Resources Control Boards. 1001 "I" Street, Sacramento, CA 95814

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

- *Bacillus thuringiensis* subsp. *israelensis* (Bti)
- *Bacillus Sphaericus* (Bs) (*Lysinibacillus Sphaericus*)
- 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
- Resmethrin
- Sumitrin
- 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<sup>2</sup> 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 (4days) can produce mosquitoes. Source reduction is the District’s preferred solution and, whenever possible, CCMAD works with property owners to effect long-term solutions to reduce or eliminate the need for continued applications as described in the State of California’s Best Management Practices for Mosquito Control in California, the Documents the District utilizes. 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 treated by the District include: all residential backyard sources, storm drains and the

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<sup>2</sup> Defined in *Permit*. Attachment A – Definitions (A-2)

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

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

With any source of mosquitoes or other vectors, CCMAD's first goal is to look for ways to eliminate the source or, if that is or feasible, for ways to reduce the potential for vectors. the most commonly used alternative control methods and their limitations are described in the *Best Management Practices for Mosquito Control in California* (pp. 4-20, 26-27).

Specific alternative control methods used by CCMAD include stocking potential mosquito breeding sources with mosquitofish (*Gambusia affinis*), educating citizens 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.

The District has a public outreach program that includes participation in educational events at local fairs, schools, clubs and town hall meetings. The meetings are designed to encourage people to take responsibility by eliminating their own sources of standing water, thus reducing chemical means of control.

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

The need to apply product is determined by surveillance. Actual use varies annually depending on mosquito activity. In 2015, the District performed zero applications to the waters of the United States. Listed under item number 3 above, are the active ingredients in the pesticides that the District will utilize if the need arises. Other public health pesticides in addition to those listed may be used as part of the District's best management practices.

**7. Representative monitoring locations<sup>3</sup> and the justification for selecting these monitoring locations.**

Please see the MVCAC NPDES Coalition Monitoring Plan.

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<sup>3</sup> Defined in *Permit*. Attachment C – Monitoring and Reporting Program (C-3)

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

Please see the *Best Management Practices for Mosquito Control in California* (p. 20).

Please also refer back to Items 2 and 5 above.

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

CCMAD's BMP's are described in Item 2 above. Specific elements have been highlighted 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;**

Spray equipment is calibrated each year and is 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 of the US 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 BMP's for each application mode, e.g. aerial, truck, hand, etc.;**

The District calibrates truck-mounted and hand-held larviciding equipment each year to meet application specifications. The General Manager reviews the applications records daily to ensure that 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 calibrated by the Contractor. Aerial adulticides equipment is calibrated regularly and droplet size will be monitored by the District to ensure droplets meet label requirements. Airplanes used in urban ULV applications and the primary airplane used for rural ULV application is equipped with



advanced guidance and drift management equipment to ensure the best available technology is being used to place product in the intended area. If a secondary airplane is used in rural ULV applications, it will be equipped with an advanced guidance system.

**e. descriptions of specific BMP's for each pesticide product used; and**

Please see the *Best management Practices for Mosquito Control in California* (pp.27-30) for general pesticide BMP's and the CDPR website,

**f. descriptions of specific BMP's for each type of environmental setting (agricultural, urban and wetland).**

Please see **Item 2** above and the *Best Management Practices for Mosquito Control in California* (pp. 4-20).

BMP's for urban settings include reminding homeowners to get rid of containers that accumulate water, encouraging people to dump or drain or maintain their ornamental ponds and other water features, and urging residents to report neglected swimming pools. These are performed through the District's public outreach, surveillance, or when responding to service requests.

An example of a BMP wetland area is stocking the source with mosquito-fish. Wetlands that retain water for lengthy periods are usually able to sustain fish populations that effectively reduce or eliminate mosquito breeding and preclude the need for pesticide application.

An example of a BMP for an agricultural setting is working with farmers to reduce the number of days irrigation water stands on the property in order to disrupt the mosquito life cycle. Over the years, the encouragement and implementation of drip irrigation systems (as opposed to flood irrigation) has dramatically reduced the need for pesticide applications in farm habitats.

**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;**

CCMAD's personnel apply pesticides to sources of mosquitoes that represent threats to the health of humans, domestic animals, or wildlife or to overall

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:

- 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
- Presence of sensitive/endangered species or habitats.

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

Please see **Item 2** above and the *Best Management Practices for Mosquito Control in California* (pp. 31-34). Please see also the *California Mosquito-Borne Virus Surveillance and Response Plan* (pp. 8-10).

CCMAD may target any and all mosquito species found within the District that become problematic due to nuisance or vector-borne disease potential.

- 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 agency's preferred solution, and whenever possible, the agency works with property owners to implement long-term solutions to reduce or eliminate the need for continued pesticide applications as described in **Item 2** above.

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

Please see **Item 2** above. CCMAD continually collects adult and larval mosquito surveillance data and dead bird reports, monitors regional mosquito-borne disease activity detected in humans, horses, birds, and/or other animals, and uses these data to guide mosquito control activities. The District employs aerial technology and works with various government planning commissions to gather data on new and existing sources such as neglected swimming pools. This technology assists the District technicians in the field, who continually sample water and are trained to seek new treatment areas.

**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.**

CCMAD 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 is discussed in **Item 2** above. 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 4-10 of the *Best Management Practices for Mosquito Control in California*.

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

CCMAD follows an existing IVM program which includes practices described in **Item 2** above.

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 vectors may pose a substantial threat to public 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 CCMAD, and is required to comply with the Department of Pesticide Regulation’s (CDPR) 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 and in-house training.