ATTACHMENT G – NOTICE OF INTENT

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 Saddle Creek Community Services, Mosquito And Vector Control District			
B. Mailing Address 1000 Saddle Creek Drive			
C. City Copperopolis	D. County Calaveras	E. State CA	F. Zip Code 95228
G. Contact Person Greg Hebard	H. Email address sccsd@caltel.com	I. Title Site Manager	J. Phone (209) 785-0100

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: Saddle Creek Golf Resort, Castle and Cook Inc., and Saddle Creek Community Services District

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: Irrigation structures and drains

3. Directly to river, lake, creek, stream, bay, ocean, etc.
☐ 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: _X_ Vector Larvae _X_ Adult Vector

B. Pesticides Used: List name, active ingredients and, if known, degradation by-products

See Attachment E and F

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

D. Types of Adjuvants Added by the Discharger:
None

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.

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: Greg Hebard

B. Signature: Greg Hebard **Date:** October 4, 2011

C. Title: Site Manager

X. FOR STATE WATER BOARD USE ONLY

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

RECEIVED
OCT 14 2011
DIVISION OF WATER QUALITY

Saddle Creek Community Services District (District) 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 District Project Area Boundary Map.

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

   The District uses Integrated Vector Management (IVM) to determine when pesticide applications are appropriate. The District considers source reduction, the elimination or reduction of mosquito breeding sites the best solution but is not always achievable for a variety of reasons. The District recognizes that the property owner/responsible party need to be educated on Best Management Practices (BMP).

   The District uses Best Management Practices for Mosquito Control in California as a guidance document. This document provides recommendations from the California Department of Public Health and the Mosquito and Vector Control Association of California to promote mosquito control on California properties, and enhance early detection of West Nile virus (WNV). This document can be obtained in its' electronic format by accessing the following website: htttp://www.westnile.ca.gov/resources.

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 following list of products may be used by the District for larval or adult control. This list is directly from Attachment E and F within the NPDES Permit for Biological and Residual Pesticide Discharges to Waters of the U.S. for Vector Control Applications. All of these products are used according to label directions and may be applied by ground (hand, truck, ATV, backpack, etc) or by air (helicopter or fixed wing aircraft).

List of Permitted Larvicide Products

Larvicide Product Name	Registration Number
Vectolex CG Biological Larvicide	73049-20
Vectolex WDG Biological Larvicide	73049-57
Vectolex WSP Biological Larvicide	73049-20
Vectobac Technical Powder	73049-13
Vectobac-12 AS	73049-38

Larvicide Product Name	Registration Number
Aquabac 200G	62637-3
Teknar HP-D	73049-404
Vectobac-G Biological Mosquito Larvicide Granules	73049-10
Vectomax CG Biological Larvicide	73049-429
Vectomax WSP Biological Larvicide	73049-429
Vectomax G Biological Larvicide/Granules	73949-429
Zoecon Altosid Pellets	2724-448
Zoecon Altosid Briquettes	2724-375
Zoecon Altosid Liquid Larvicide Mosquito Growth Regulator	2724-392
Zoecon Altosid XR Entended Residual Briquets	2724-421
Zoecon Altosid Liquid Larvicide Concentrate	2724-446
Zoecon Altosid XR-G	2724-451
Zoecon Altosid SBG Single Brood Granule	2724-489
Mosquito Larvicide GB-1111	8329-72
BVA 2 Mosquito Larvicide Oil	70589-1
BVA Spray 13	55206-2
Agnique MMF Mosquito Larvicide & Pupicide	53263-28
Agnique MMF G	53263-30
Abate 2-BG	8329-71
5% Skeeter Abate	8329-70
Natular 2EC	8329-82
Natular G	8329-80
Natular XRG	8329-83
Natular XRT	8329-84
FourStar Briquets	83362-3
FourStar SBG	85685-1
Aquabac xt	62637-1
Spheratax SPH (50 G) WSP	84268-2
Spheratax SPH (50 G)	84268-2

List of Permitted Adulticide Products

Adulticide Product Name	Registration Number
Pyrocide Mosquito Adulticiding Concentrate for ULV Fogging 7395	1021-1570

Adulticide Product Name	Registration Number
Evergreen Crop Protection EC 60-6	1021-1770
Pyrenone Crop Spray	432-1033
Prentox Pyronyl Crop Spray	655-489
Pyrocide Mosquito Adulticiding Concentrate for ULV Fogging 7396	1021-1569
Aquahalt Water-Based Adulticide	1021-1803
Pyrocide Mosquito Adulticide 7453	1021-1803
Pyrenone 25-5 Public Health Insecticide	432-1050
Prentox Pyronyl Oil Concentrate #525	655-471
Prentox Pyronyl Oil Concentrate or 3610A	655-501
Permanone 31-66	432-1250
Kontrol 30-30 Concentrate	73748-5
Aqualuer 20-20	769-985
Aqua-Reslin	432-796
Aqua-Kontrol Concentrate	73748-1
Kontrol 4-4	73748-4
Biomist 4+12 ULV	8329-34
Permanone RTU 4%	432-1277
Prentox Perm-X UL 4-4	655-898
Allpro Evoluer 4-4 ULV	769-982
Biomist 4+4	8329-35
Kontrol 2-2	73748-3
Scourge Insecticide with Resmethrin/Piperonyl Butoxide 18%+54% MF Formula II	432-667
Scourge Insecticide with Resmethrin/Piperonyl Butoxide 4%+12% MF Formula II	432-716

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 Saddle Creek Community Services District and Saddle Creek Mosquito and Vector Control Districts' 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 Item 2 above. Mosquito breeding sources and areas that require adult mosquito control are difficult to predict from year to year based on the weather variations in local environmental conditions. However, the typical sources treated by this District include: permanent/semi-permanent/seasonal

wetlands, pastures, golf courses, associated water conveyance systems, and storm drains within District Project Area. Please see District Boundary Map and Site Map.

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

With any mosquito source, the Districts' goal is to eliminate the source if possible. However, if a source can not be eliminated by the District, it uses IVM and BMP to reduce potential vector outbreaks.
The District also distributes *Gambusia affinis* (mosquitofish) to wetlands, associated water conveyance systems and neglected swimming pools as needed. District Personnel identifies mosquito breeding sites and work with property owners and land managers to reduce or eliminate mosquito breeding habitats.

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 abundance. The pesticide amounts presented below were taken from the Saddle Creek Mosquito and Vector Control District's 2010 PUR as an estimate of pesticide use in 2011. Other public health pesticides in addition to those listed below may be used as part of the agency's BMPs.

EPA #	Pesticide	Amount	Unit
73049-10	VECTOBAC G	380	LBS
432-1050	PRYONONE 25-5	67.8	GAL

Pesticide amounts from 2010 were used as a gauge to determine 2011 pesticide use. The above totals represent all pesticide applications within the District Project Area Boundaries.

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 uses IVM and BMP for Mosquito Control in California used to reduce the Risk of Mosquito-Associated Disease and Annoyance.

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

The Saddle Creek Mosquito and Vector Control District's BMPs are described in Item 2. Specific elements have been highlighted below under items A-F.

A. Measures to prevent pesticide spill

District staff monitors application equipment on a daily basis to ensure proper working order. The Districts trains it employees on spill mitigation and response. Spill kits are provided in each spray vehicle and master spill kits for larger spills are located at the District office for immediate response for both on-site and off-site spills.

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. Each time an application is made staff check their calibration by determining the amount of area treated and the amount of material used. If there is a discrepancy the equipment is re-calibrated.

C. A plan to educate Coalition's or Discharger's staff and pesticide applicator on any potential adverse effects from the pesticide application.

Applicators are continually trained through the California Department of Public Health.

D. Descriptions of specific BMPs for each spray mode, e.g. aerial spray, truck spray, hand spray, etc.; cease and desist order

Saddle Creek Mosquito and Vector Control District will calibrate truck and hand larviciding equipment each year to meet application specifications. District personnel review spray records daily to ensure appropriate amounts of material are being used. Ultra Low Volume (ULV) equipment is calibrated for output and droplet size to meet label requirements. Contracted aerial larviciding equipment will be calibrated by the Contractor. Contracted aircraft will be equipped with advance guidance systems as well as drift management equipment to ensure the best available technology is being used to place product in the intended spray area.

E. Description of specific BMPs for each pesticide product used; and

Please see the Best Management Practices for Mosquito Control in California for general pesticide application BMPs, and the current approved pesticide labels for application BMPs for specific products.

F. Descriptions of specific BMPs for each type of environmental setting (agriculture, urban, and wetlands).

Please see Item 2. Saddle Creek Mosquito and Vector Control District works with Saddle Creek Community Services District in water management on its ponds and wetlands. In reference to agriculture, this does not apply. Saddle Creek Mosquito and Vector Control District works with residents within the district's boundaries to eliminate water sources through community outreach.

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:

The District's BMPs are described in the Best Management Practices for Mosquito Control in California and IVM practices used to reduce the Risk of Mosquito-Associated Disease and Annoyance.

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

Only those sources that Saddle Creek Mosquito and Vector Control District determines to represent imminent threat to public health or quality of life are treated. The District recognizes that site specific and incident specific conditions are highly variable and unpredictable and that the District relies upon the professional judgment of its employees to determine treatment thresholds. The presence of any mosquito may necessitate treatment, however higher thresholds may be applied depending on the District's resources, disease activity, or local needs. Treatment thresholds are based on a combination of the following criteria:

- Mosquito species present
- Mosquito stage/development rate
- Disease potential/pest or nuisance value
- Disease activity
- Mosquito Abundance
- Flight range
- Proximity to populated areas
- Size of source
- Presence/absence of natural 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 Item 2. Our main target species are *Aedes sierrensis* and *Culex tarsalis* and are controlled through surveillance, source reduction and BMPs pesticide treatments.

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

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 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.

This information is located at the Saddle Creek Community Services District office. The District uses New Jersey Light Traps (NJLT) to collect abundance data for various mosquito species. The District also participates in the dead bird program through the California Department of Public Health Services. NJLT are located throughout the District. Collections are made weekly beginning April through October of each year. Sentinel chickens are located within the District to isolate virus activity and to assess current control program effectiveness. Control Operator inspections and trapping data provide the District with larval and adult mosquito abundance to determine future spray applications to reduce nuisance and risk of mosquito borne infections to people and their animals.

11. Examination of Pesticide Use 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 management and treatment options that may impact water quality, non-target organisms, vector resistance, feasibility, and cost effectiveness, such as:

- **No action**
- **Source prevention**
- **Mechanical or physical source reduction methods**
- **Cultural methods**
- **Biological control agents**
- **Pesticides**

If there are no alternatives to pesticides, dischargers shall use the least toxic pesticide necessary to control the target pest and apply pesticides only when vectors are present at a level that will constitute a nuisance or a threat to public health.

Saddle Creek Mosquito and Vector Control District 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 4-19 of the Best Management Practices for Mosquito Control in California.

Implementing preferred alternatives depends 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.

Saddle Creek Mosquito and Vector Control District follows an existing IVM program which includes practices described in the 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 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 proper spraying techniques and equipment, taking account of weather conditions and the need to protect the environment.

This is an existing practice of the Saddle Creek 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.

13. Website for Public Notice

Saddle Creek Community Services District uses websites to keep residence and interested parties informed about mosquito control.
District site: www.saddlecreekcsd.org

References:

Best Management Practices for Mosquito Control in California. 2011. Available by download from the California Department of Public Health—Vector-Borne Disease Section at http://www.westnile.ca.gov/resources.php under the heading *Mosquito Control*

and Repellent Information. Copies may be also requested by calling the California Department of Public Health—Vector-Borne Disease Section at (916) 552-9730 or the Saddle Creek Mosquito and Vector Control District at (209) 785-0100.

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 http://www.westnile.ca.gov/resources.php under the heading *Response Plans and Guidelines*. Copies may be also requested by calling the California Department of Public Health—Vector-Borne Disease Section at (916) 552-9730 or the Saddle Creek Mosquito and Vector Control District at (209) 785-0100.

MVCAC NPDES Coalition Monitoring Plan. 2011. [In development at the time of this draft]

District Boundary and Site Maps, Saddle Creek Mosquito and Vector Control District (209) 785-0100.

March 3, 2011

Saddle Creek Community Services District
1000 Saddle Creek Drive
Copperopolis, CA. 95228

RE: Notification by Saddle Creek Mosquito and Vector Control District
Intent to Apply Pesticides
For Mosquito Control Purposes Under the General National Pollutant
Discharge Elimination System Permit for Vector Control Applications

Dear Sir,

The District (Discharger) is required as part of its obligation under the Vector Control General National Pollutant Discharge Elimination System permit to provide advanced notice every calendar year, prior to the first application of pesticides, that may potentially have an affect on a governmental agency. This letter is to serve notice that the District intends to apply pesticides within the District's boundaries from March 1, 2011 through November 30, 2011 as necessary to reduce the risk to the public from mosquito-borne diseases such as West Nile virus.

The following is a list of pesticides that may be used by the District in controlling mosquitoes:

larvicides:	**Registration Number:**
BVA 2 Mosquito Larvicide Oil	70589-1
A.L.L. Pellets	2724-448
Zoecon Altosid Briquets (120 day)	2724-421
Zoecon Altosid Liquid Larvicide Mosquito Growth Regulator	2724-392
Zoecon Altosid XR-G	2724-451
Vectobac-G Biological Mosquito Larvicide Granules	73049-10
Vectolex CG Biological Larvicide	73049-20
Vectolex WDG Biological Larvicide	73049-57
Vectomax CG Biological larvicide	73049-429
Agnique MMF Mosquito Larvicide & Pupicide	53263-28
Adulticides:	
Pyrocide Mosquito Adulticiding Concentrate for ULV Fogging 7396	1021-1569
Pyrenone 25-5 Public Health Insecticide	432-1050
Duet Dual-Action Adulticide	1021-1795
Aqua-ANVIL Water-based Adulticide	1021-1807

All larvicides are used to control mosquitoes found in such sources as catch basins, storm basins and backyard sources like swimming pools and ornamental ponds, agricultural, wetland/riparian sites or any other place where water stands long enough to cause mosquito larvae to be present.

Adulticides are used to control adult mosquitoes and will be used to control mosquitoes found in Saddle Creek Community Services District boundary that will affect people in the District. This can include agricultural, urban, suburban, wetland/riparian environments. Routinely adulticide applications will be made Thursday evening from 6:OO pm to 10:00 pm. However, on occasion applications may be made at sunrise or early morning.

Anyone interested in obtaining additional information from the District (Discharger) can contact Greg Hebard at the District office from 8:00 am to 4:00 pm.

Saddle Creek Mosquito and Vector Control District
1000 Saddle Creek Drive
Copperopolis, CA. 95228
(209) - 785 - 0100

Sincerely,

Greg Hebard

Greg Hebard, Manager

SADDLE CREEK RESORT

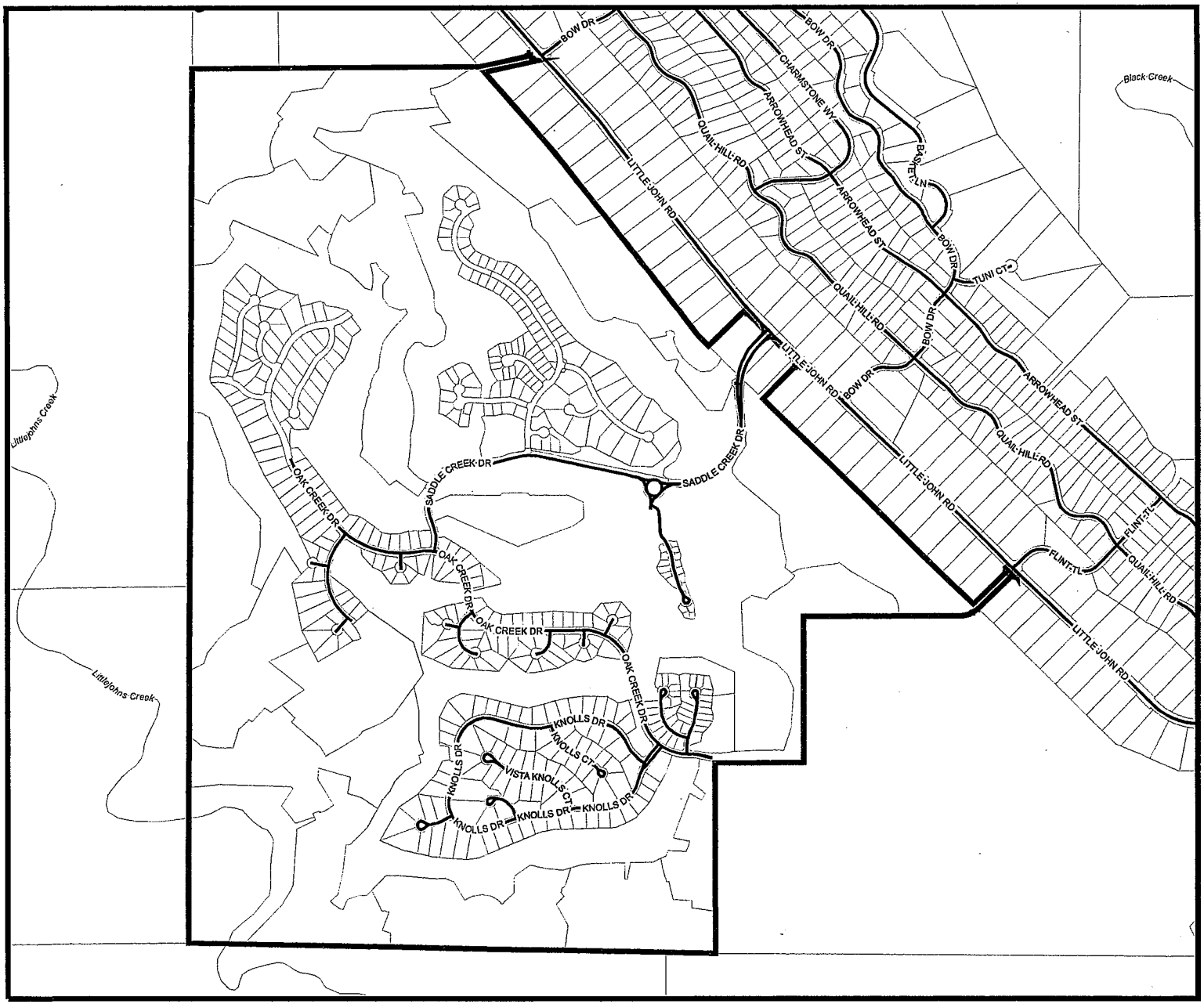
A Castle & Cooke Community

Community Site Plan

Saddle Creek Community Site Plan Legend

P1 – P18 = Pond and Its identifying Number or Letter

WL 1 – WL 19 = Wet Land and its identifying Number or Letter



Calaveras County Community Service District (Saddle Creek)

N
W E
S

Legend

Community Service Districts

- Saddle Creek
- Parcels
- Roads
- Highways
- Main Creeks
- Lakes

All district boundaries are generalized and are not to be used on a parcel by parcel basis.

Map Design and Cartography
By Calaveras County GIS
San Andreas, CA 95249
Sept, 2005

0.07 0.035 0 0.07 0.14 0.21 0.28
Miles

EXHIBIT 1

VICINITY MAP