June Lake Public Utility District
P O Box 99
June Lake, CA 93529
(760) 648-7778 Fax (760) 648-6801
jlpudnfire@qnet.com

State Water Resources Control Board
Division of Water Quality
P.O. Box 100
Sacramento, CA 95812-0100

March 24, 2016

Attention: Vector Control "NPDES Permit Application Department"

Subject: Application for General Permit CAG990004 (NOI and PAP Documents being submitted by the June Lake Public Utility District)

Dear Sirs, please find submitted with this letter the June Lake Public Utility District "Notice of Intent" application dated March 24, 2016 and our completed "Pesticide Application Plan" (PAP) dated March 24, 2016 for your review and approval. Additionally, we have included a $241.00 check covering the filing fee expense for first time enrollee.

Should you have any questions or require additional information please do not hesitate to call me at 760-648-7778 ext. 12.

Best Regards,

Paula Welch
General Manager

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			
June Lake Public Utility District			
B. Mailing Address			
P. O. Box 99			
C. City	D. County	E. State	F. Zip Code
June Lake	Mono	CA	93529
G. Contact Person	H. Email address	I. Title	J. Phone
Paula Welch	pudgm@qnet.com	General Manger	760 648-7778

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: Reverse Creek Ditch, Marshes, tree wells, Snow melt adjacent to creeks and lakes

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: Reverse Creek, Gull Lake, Silver Lake, June Lake.

* 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 6
(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

C. Period of Application: Start Date April End Date August

D. Types of Adjuvants Added by the Discharger:
See Attachment

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: Paula Welch

B. Signature: Paula Welch **Date:** 3/24/2016

C. Title: General Manger

X. FOR STATE WATER BOARD USE ONLY

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

June Lake Public Utility District

Attachment for NOI dated March 24, 2016 (Section IV)

Chemical List for (JLPUD) Mosquito Abatement Program

Fogging Application

- Master Line Kontrol 2-2 – Active Ingredient: Piperonyl Butoxide 2% (EPA No. 73748-3)
- Scourge Insecticide - Active Ingredient: Resmethrin 4.14% (EPA No. 432-716)

Hand Application

- Vectobac Tech Powder Bacillus – Active Ingredient: Thuringiensug Israelensis 99% (EPA No. 73049-13)
- Golden Bear Oil – Active Ingredient: Aliphatic Pet Hydrocarbons 98.7% (EPA No. 8329-72)
- Altosid Briquettes – Active Ingredient: Methoprene 8.62% (EPA No. 2724-375)
- Vectobac® Granules – Active Ingredient: Thuringiensug Bacillus Israelensis 2.8% (EPA No. 73049-10)

Prepared March 24, 2016 – Paula Welch

June Lake Mosquito Zones

(Kill 'em All)

In Town (Around June Lake)

- June Lake CG
- Big Rock Resort
- June Lake Marina
- Behind General Store
- Town Ditches
- Holes around Homes
- June Lake Shoreline
- June Lake Tract
- Edgewater
- Above Lakeview Drive

Gull Lake Area

- North Tract
- South Tract
- Gull Lake CG
- Reverse Creek CG
- Public Boat Launch Bog

Mountain Area

- Parking Lot Ditch & Across Highway
- Day Care and Garage
- East & West Edges of Lot
- Horse Meadows (North and South)

Peterson Tract

- Just check around homes

Fern Creek/Carson Peak Inn Area

- Birch Creek Lots
- Morgan Ditch & 2 roads across highway from Morgan Ditch
- Trailer and Homes behind CPI
- Hideaway Meadows

Double Eagle Area

- Woods south of Cabins and Spa
- Rossier Lawn & under Porch
- Ditch near Whispering Pines Garage
- Black's House and Corral
- Black's Meadow & Pond
- Snake Pond
- Ditches along Nevada St.
- Millionaire Row
- Around Station 2 & Dream Mountain Tract

Silver Lake Area

- South Bog (Hot Zone)
- SLCG and across creek
- Meadows North of SLCG
- Edison Ditches
- Across Highway from Edison

June Lake Mosquito Abatement Locations

Numbers refer to map locations, # signifies a good fogging location, $ signifies popcorn area

Map Number 1: Town, June Lake, and Gull Lake

Town and June Lake

-- June Lake Shoreline:

1# -- From June Lake H_2O plant, east to Boulder Lodge docks, west to Big Rock

2# -- Along June Lake tract

3#$ -- Edgewater Bog

4# -- Willows south of June Lake Marina and West of JLCG

\# -- Old water tanks above town, take trail west from dirt road of Lakeview Drive:

5 -- one concrete tank above old wooden barrel tank

6 -- one steel tank above trail

7 -- one concrete tank below trail, just east of very large downed tree

-- Check all town ditches and around homes, especially behind the Country Store

Gull Lake

-- Shoreline

8 -- Gull Lake north tract

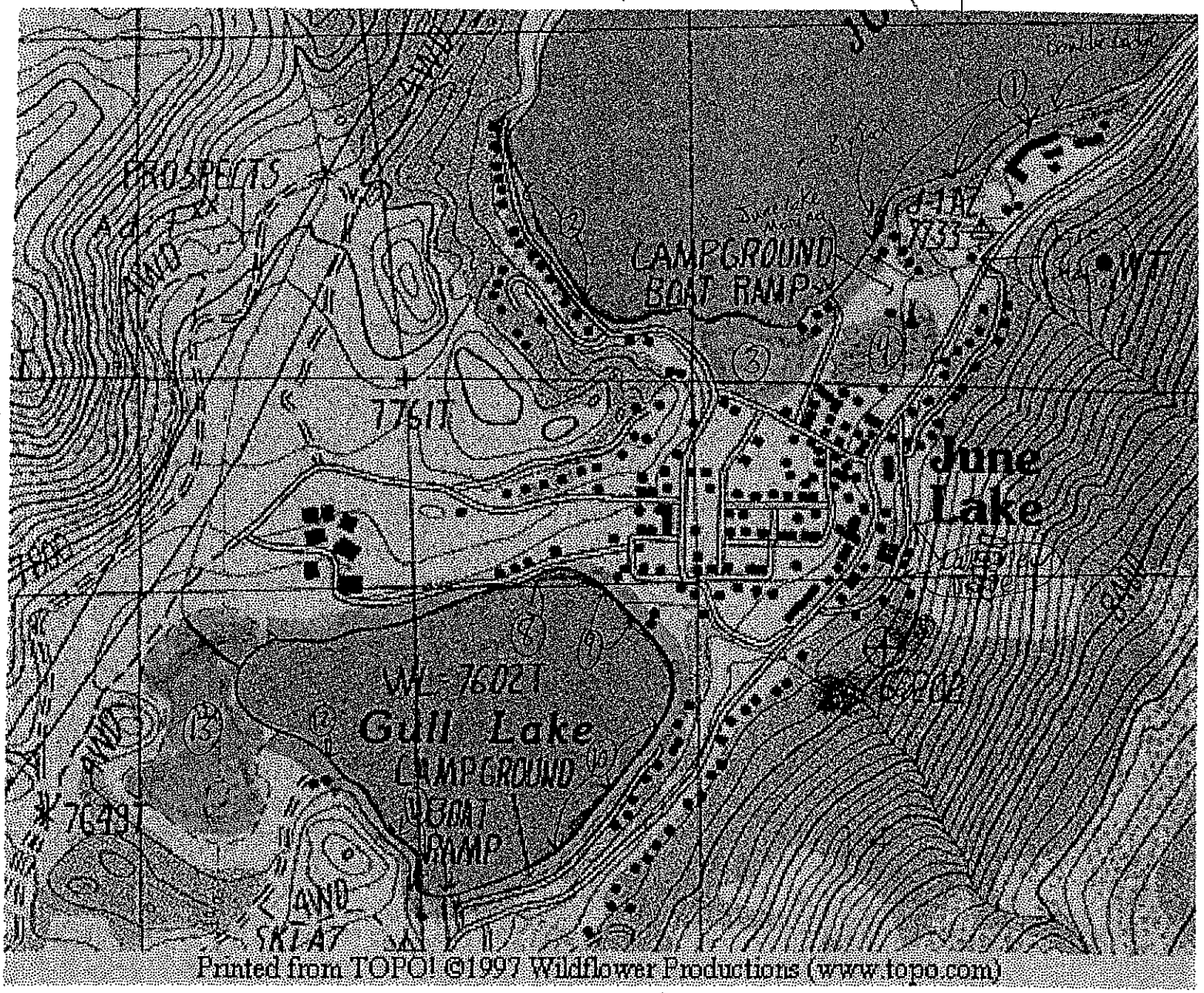
9 -- Community park

10 -- Gull lake campground and south tract

11 -- Fisherman trail west of campground

12 -- Boat launch

13$ -- Gull Lake Bog


PROSPECTS
CAMPGROUND
BOAT RAMP
7733
7751
June
Lake
7602
Gull Lake
CAMPGROUND
BOAT
RAMP
7649
SKI AT
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Map Number 3: Down Canyon

Double Eagle/Nevada Street Area

-- Hole just North of Larry's driveway

-- Fern Woods south of Double Eagle, west of Fern Creek trailhead:

1 -- Large snag east of the trail that heads south from volleyball court

2 -- Ditches along an unmaintained road, south of the cabin dumpsters

3 -- Nevada Street

-- The Rossier Estates, check under porch, fog frequently

-- Ditches along road

-- Holes next to Mike White's house

-- Willows behind lift station

4$ -- Black's meadow

5#$ -- Snake Pond (fog willows and Aspens on edges)

-- Fog along Silver Lake tract

6 -- Black's house and corral

7# -- Woods around dream mountain tract and Station 2

8# -- Woods on both sides of highway between Station 2 and Edison Plant

9 -- Edison Ditch

Silver Lake Area

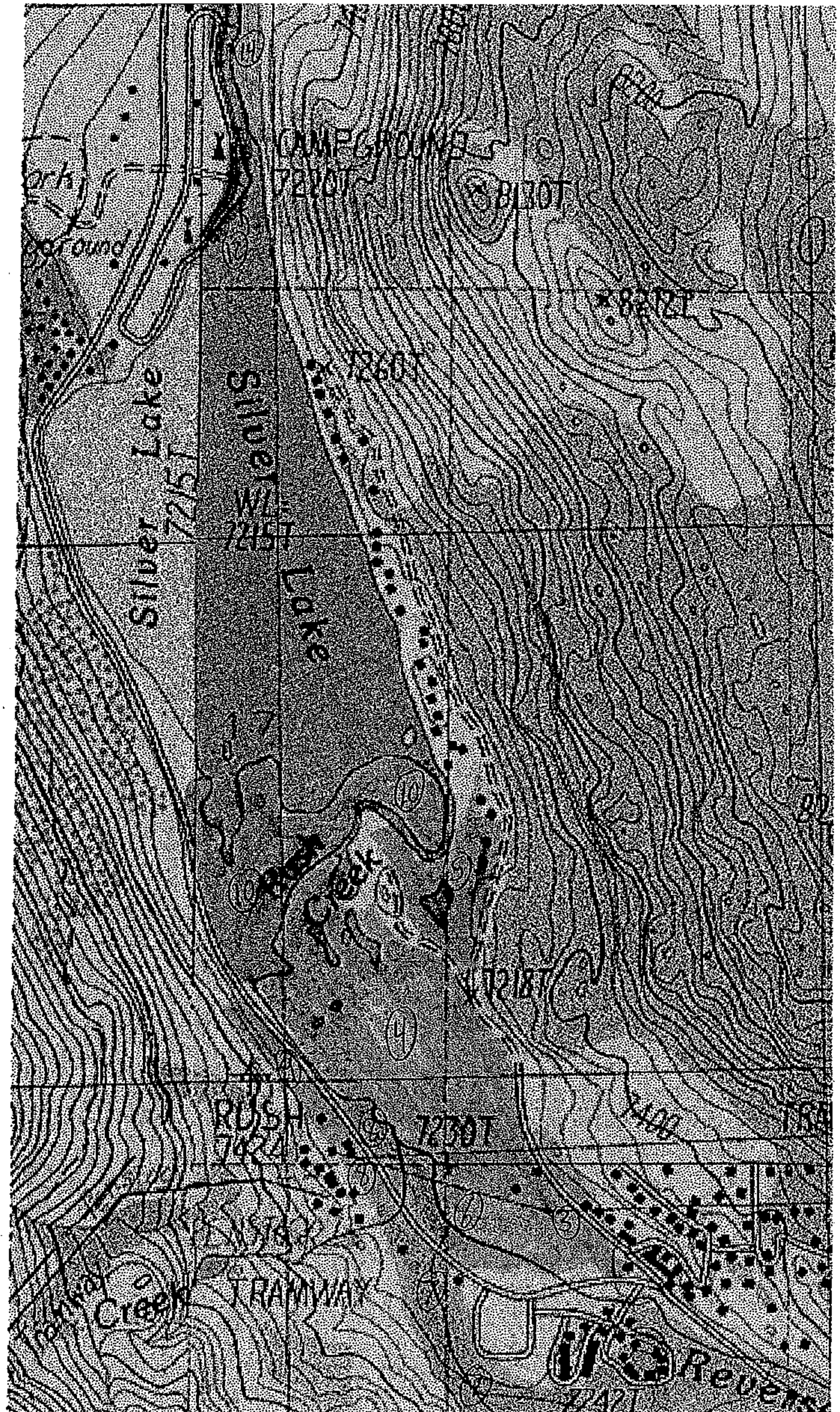
10#$ -- South Silver Lake Bog (Hot Zone!! Head nets recommended)

-- Silver Lake Campground

12 -- Holes along lake shore near Silver Lake outlet

13 -- Holes and willows around North end of campground

14# -- Ditches across Rush Creek (cross just north of CG, then travel south)



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Map Number 2: June Mountain, Fern Creek, and Carson Peak Inn

June Mountain Area

-- June Mountain:

1 -- Ditch between parking lot and highway
2 -- Ditches in natural area in center of parking lot
3 -- Ditches along northwest corner of parking lot
4 -- Ditch across the street from the parking lot
5 -- Holes around base of chair 5 and above the old daycare
-- Ponds around upper chairlifts

6 -- Check between Mountain parking lot and Reverse Creek CG

7 -- Dink's Meadows (North and South of Highway)

Fern Creek/Carson Peak Inn

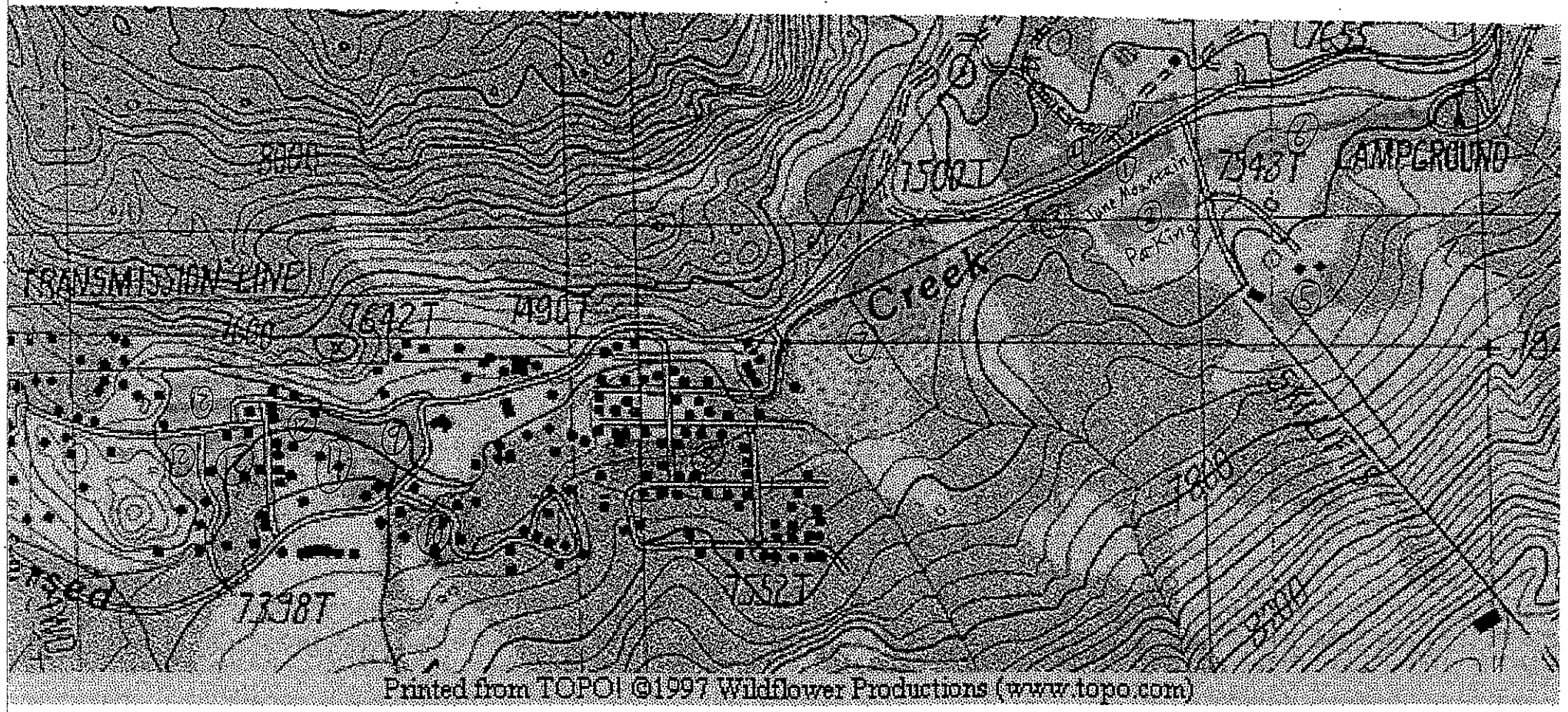
8 -- Check boggy area around Birch Creek

9# -- Morgan Ditch

10 -- Check 2 dirt roads across from Morgan Ditch

11 -- Trailer grass and willows behind Carson Peak Inn

12 -- Hideaway Meadows
-- Behind Gidney's Duplexes
-- Ditch by Harv's house


TRANSMISSION LINE
Creek
CAMPGROUND
Printed from TOPO! ©1997 Wildflower Productions (www.topo.com)

Pesticides Application Plan (PAP)

Agency: June Lake Public Utility District

Date Prepared: March 24, 2016

1. The NPDES Permit requires a Pesticides Application Plan (PAP) that contains the following elements:

a. **Description of the target area and adjacent areas, if different from the water body of the target area: See attached June Lake Mosquito Abatement Map**

b. **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

c. **Type(s) of pesticides used, the method in which they are applied, and if applicable, the adjuvants and surfactants used;**
Please see the Best Management Practices for Mosquito Control in California

d. **Description of the types and locations of the anticipated application area* and the target area to be treated by the Discharger, recognizing that, with vector control, the precise locations may not be known until after surveillance;**

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 Best Management Practices for Mosquito Control in California. The typical sources treated by this District include: **Marshes, tree wells, snow melt areas adjacent to creeks and lakes.**

e. **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 Best Management Practices for Mosquito Control in California.
Specific methods used by the District include 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

f. **Approximately how much product is anticipated to be used and how this amount was determined: Based on estimated acreage for service area**

Fogging Application

- Approximately 24 Ounces per year - Master Line Kontrol 2-2 – Active Ingredient: Piperonyl Butoxide 2% (EPA No. 73748-3)
- Approximately 72 Ounces per year - Scourge Insecticide - Active Ingredient: Resmethrin 4.14% (EPA No. 432-716)

Hand Application

- Approximately 150 Pounds per year - Vectobac Tech Powder Bacillus – Active Ingredient: Thuringiensug Israelensis 99% (EPA No. 73049-13)
- Approximately 864 Ounces per year - Golden Bear Oil – Active Ingredient: Aliphatic Pet Hydrocarbons 98.7% (EPA No. 8329-72)
- Approximately 1 Pound per year - Altosid Briquettes – Active Ingredient: Methoprene 8.62% (EPA No. 2724-375)
- Approximately 800 Pounds per year - Vectobac® Granules – Active Ingredient: Thuringiensug Bacillus Israelensis 2.8% (EPA No. 73049-10)

g. **Representative monitoring locations* and the justification for selecting these monitoring locations**
Please see the MVCAC NPDES Coalition Monitoring Plan

h. **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**
Please see the Best Management Practices for Mosquito Control in California

i. **Description of the BMPs to be implemented**
Please see the Best Management Practices for Mosquito Control in California

2. The Discharger shall update the PAP periodically and submit the revised PAP to the State Water Board for approval if there are any changes to the original PAP.

D. Best Management Practices (BMPs)

The District's BMPs are described in the Best Management Practices for Mosquito Control in California and the California Mosquito-borne Virus Surveillance and Response Plan.

1. <u>Identify the Problem</u>

Prior to first pesticide application covered under this General Permit that will result in a discharge of 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. **Establish densities for larval and adult vector populations to serve as action threshold(s) for implementing pest management strategies**

Only those mosquito sources that District staff determines to represent imminent threats to public health or quality of life are treated. 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 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 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 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 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 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 Districts uses. The District continually collects adult and larval mosquito surveillance data.

2. <u>Examine the Possibility of Alternatives to Treatments</u>

Dischargers should continue to examine the possibility of alternatives 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**

b. Applying pesticides only when vectors are present at a level that will constitute a nuisance or threat to public health

c. Using the least intrusive method of pesticide application.

d. Public education efforts to reduce potential vector breeding habitat.

e. Applying a decision matrix concept to the choice of the most appropriate formulation.

This describes the District's existing integrated vector management (IVM) program, as well as the practices described in the California Mosquito-borne Virus Surveillance and Response Plan and Best Management Practices for Mosquito Control in California that are used by this agency.

3. <u>Correct Use of Pesticides</u>

Users 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.

a. **All errors in application and spills are reported to the proper authority.**
b. **Staff training in the proper application of pesticides and handling of spills.**

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.

E. Pesticide Application Log

The Discharger shall maintain a log for each pesticide application. The application log shall contain, at a minimum, the following information, when practical, for larvicide or adulticide applications:

1. Date of application;
2. Location of the application and target areas (crossroads, or map coordinates);
3. Name of applicator;
4. The names of the water bodies treated if known (i.e., canal, creek, lake, etc.);

5. Application details, such as when the application started and stopped, pesticide application rate and concentration, water flow rate of the target area, surface water area, volume of water treated, pesticide(s) and adjuvants used by the Discharger, and volume or mass of each component discharged;

This is an existing practice of the District as required to comply with DPR regulations and our CDPH Cooperative Agreement requirements.

References:

Best Management Practices for Mosquito Control in California. 2010. Available by download from the California Department of Public Health—Vector-Borne Disease Section at http://www.cdph.ca.gov/HealthInfo/discond/Pages/MosquitoBorneDiseases.aspx or 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 June Lake Public Utility District – (760) 648-7778

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.cdph.ca.gov/HealthInfo/discond/Pages/MosquitoBorneDiseases.aspx or 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 June Lake Public Utility District – (760) 648-7778

MVCAC NPDES Coalition Monitoring Plan. 201