



July 16, 2014

On July 2, 2014 the Vector Control Permit amendment was approved by the State Water Resource Control Board Members. The amendment does the following: (1) Add to the permit all adulticide and larvicide active ingredients that are currently registered by DPR for vector control, but are not currently listed in the permit; (2) Provide receiving water limitations and receiving water monitoring triggers for the active ingredients that are being added to the permit; and (3) Include language that allows adulticides and larvicides that are newly-registered in California and that are based on active ingredients currently registered by DPR to be used for vector control without having to further amend the permit.

The MVCAC Coalition believes that these changes modify the current PAP's filed by the members from the following section:

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.

Page 5, section II.A,

This General Permit covers the point source discharge of biological and residual pesticides resulting from direct and spray applications for vector control using:

- 1) larvicides containing monomolecular films, methoprene, *Bacillus thuringiensis* subspecies *isralensis* (or Bti), *Bacillus sphaericus* (or B. Sphaericus), temephos, petroleum distillates, or spinosad; and
- 2) adulticides containing malathion, naled, pyrethrin, deltamethrin, etofenprox, lambda-cyhalothrin, permethrin, prallethrin, resmethrin, sumithrin, piperonyl butoxide (PBO), or N-octyl bicycloheptene dicarboximide (or MGK-264).

These products may be applied by hand, truck, backpack, hand can, helicopter, or fixed wing methods according to the label directions. .

Therefore, all members of the Mosquito and Vector Control Association of California NPDES permit coalition hereby submit to revise their respective Pesticide Application Plan (PAP) to include the point source discharge of biological and residual pesticides resulting from direct and spray applications for vector control as modified at the July 2nd SWRCB Meeting. Attached, please find a list of all members to which this request applies.

Sincerely,
Craig Downs, MVCAC President

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Table 1. Members of the MVCAC NPDES Permit Coalition

Alameda County MAD	Merced County MAD
Alameda County VCSD	Napa County MAD
Burney Basin MAD	Nevada County Community Development Agency
Butte County MVCD	Northern Salinas Valley MAD
City of Alturas	Northwest MVCD
City of Blythe	Orange County VCD
City of Long Beach	Oroville MAD
City of Moorpark	Owens Valley MAD
City of Pasadena	Pine Grove MAD
City of San Francisco	Placer MVCD
Coachella Valley MVCD	Riverside County Vector Control Program
Colusa MAD	Sacramento - Yolo MVCD
Compton Creek MAD	Saddle Creek Community Services District
Consolidated MAD	San Benito County Agricultural Commission
Contra Costa MVCD	San Bernardino County
Delta VCD	San Diego County Department of Environmental Health - Vector Control Program
Durham MAD	San Gabriel Valley MVCD
East Side MAD	San Joaquin County MVCD
El Dorado County Environmental Management	San Mateo County MVCD
Fresno MVCD	Santa Barbara County, Mosquito and Vector Management District of
Fresno Westside MAD	Santa Clara County VCD
Glenn County MVCD	Santa Cruz County MVCD
Greater Los Angeles County VCD	Shasta MVCD
Imperial County Vector Control	Solano County MAD
June Lake Public Utility District	South Fork MAD
Kern MVCD	Sutter-Yuba MVCD
Kings MAD	Tehama County MVCD
Lake County VCD	Tulare County MAD
Los Angeles County West VCD	Turlock MAD
Madera County MVCD	Ventura County Environmental Health Division
Mammoth Lakes MAD	West Side MVCD
Marin/Sonoma MVCD	West Valley MVCD

Notes:

MAD = Mosquito Abatement District

MVCD = Mosquito and Vector Control District

VCD = Vector Control District

VCSD = Vector Control Services District