Attachment E – Notice of Intent

WATER QUALITY ORDER NO. 2013-0002-DWQ GENERAL PERMIT NO. CAG990005

STATEWIDE GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT FOR RESIDUAL AQUATIC PESTICIDE DISCHARGES TO WATERS OF THE UNITED STATES FROM ALGAE AND AQUATIC WEED CONTROL APPLICATIONS

I. NOTICE OF INTENT STATUS (see Instructions)

Mark only one item
A. X New Applicator
B. Change of Information: WDID# SA51NP00010
C. [ ] Change of ownership or responsibility: WDID#

II. DISCHARGER INFORMATION

A. Name
Reclamation District 1500 &
Sutter Mutual Water Company

B. Mailing Address
P.O. Box 96

C. City
Robbins

D. County
Sutter

E. State
Ca.

F. Zip
95676

G. Contact Person
Jack Bailey
Richard Webb

H. E-mail address
Reclalm1500@hotmail.com
Richardwebb36@ymail.com

I. Title
Field Manager

J. Phone
(530)738-4423

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

G. E-mail address

H. Title

I. Phone
IV. RECEIVING WATER INFORMATION

A. Algaecide and aquatic herbicides are used to treat (check all that apply):

☐ 1. Canals, ditches, or other constructed conveyance facilities owned and controlled by Discharger. Name of the conveyance system: __Drain Ditches

☐ 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:  

B. Regional Water Quality Control Board(s) where treatment areas are located
   (REGION 1, 2, 3, 4, 5, 6, 7, 8, or 9): Region 5
   (List all regions where algaecide and aquatic herbicide application is proposed.)

V. ALGAECIDE AND AQUATIC HERBICIDE APPLICATION INFORMATION

A. Target Organisms: __California Water Primrose, Aquatic Surface Weeds

B. Algaecide and Aquatic Herbicide Used: List Name and Active ingredients

   Roundup Custom for Aquatic & Terrestrial  Glyphosate

C. Period of Application: Start Date _____May 1_______ End Date _____for Life of Permit_________

D. Types of Adjuvants Used:  
   Activate Plus 10%
GENERAL NPDES PERMIT FOR RESIDUAL AQUATIC PESTICIDE DISCHARGES FROM ALGAE AND AQUATIC WEED CONTROL APPLICATIONS

ORDER NO. 2013-0002-DWQ
NPDES NO. CAG990005

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: Jack Bailey Jr
B. Signature: [Signature]
C. Title: Field Manager

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<th>Date NOI Received:</th>
<th>Date NOI Processed:</th>
</tr>
</thead>
</table>

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<th>Fee Amount Received:</th>
<th>Check #:</th>
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☐ Lyris List Notification of Posting of APAP

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</table>
Aquatic Pesticides
Application Plan (APAP)

Sutter Mutual Water Company
15094 Cranmore Road
Robbins Ca. 95676

R.D. 1500
15094 Cranmore Road
Robbins Ca. 95676
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Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure 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 and imprisonment for knowing violations."

________________________
Richard Webb
Operations Manager
Sutter Mutual Water Company
1. EXECUTIVE SUMMARY

Sutter Mutual Water Company has prepared this Aquatic Pesticides Application Plan (APAP) in accordance with Water Quality Order No. 2013-0002-DWQ (Order) for the Statewide General National Pollutant Discharge Elimination System (NPDES) Permit for Residual Aquatic Pesticide Discharges to Waters of the United States from Algae and Aquatic Weed Control Applications (General Permit # CAG990005).

The purpose of this APAP is to provide detailed information of the use of aquatic pesticides in Companies facilities to control the growth of aquatic weeds. This APAP provides a description of the facilities where pesticides will be applied, a description of the targeted weeds, a list of aquatic pesticides used, and other pertinent information as described in Section 5 of the Order. This APAP is intended to be a living document that is revisited and updated on an annual basis to maintain compliance with General Permit # CAG990005 and any amendments.

2. DESCRIPTION OF WATER SYSTEM

Sutter Mutual Water Company operates and maintains an irrigation water distribution system of approximately 100 miles of open flow canals. The S.M.W.C. distribution system consists of the S.M.W.C. Canal and the United States Bureau of Reclamation R.D. 1500 (USBR) distribution system. The SMWC and USBR distribution systems are comprised of Primary Canal, Main Laterals and Sub Laterals. All other lateral canals receive water from one or more of the primary canal systems.

Both the SMWC and Bureau distribution systems require the application of aquatic pesticides as a method of weed control. The majority of the open canals that comprise each system require the application of one or more aquatic pesticides.

3. DESCRIPTION OF THE TREATMENT AREA

The SMWC and RD 1500 Distribution System are shown on the map in Appendix A. All portions of a canal may or may not be treated during the course of the irrigation season depending upon the weed growth and effectiveness of the aquatic pesticide application.
4. TARGETED WEEDS

SMWC and RD 1500 are targets one weeds at this time and that is Primrose.

Failure to adequately control weed growth in District facilities has detrimental effects. Weed growth significantly limits the amount of water that can be conveyed through District facilities. Substantial weed growth also clogs irrigation structures, increasing the risk of flooding and canal breaks. Consistent and effective weed control will not only improve the District’s ability to serve its customers, it also provides cleaner water and improves public safety during high flows. Weed growth also causes maintenance issues for farmers when it clogs pumps, filters, and other irrigation equipment. This discourages the use of surface water.

5. AQUATIC PESTICIDES USED AND APPLICATION METHOD

SMWC and RD 1500 are using Round Up Custom for aquatic pesticide. Table 2 provides the names and descriptions of the aquatic pesticides and adjuvants used, along with their respective application methods.

TABLE 2: AQUATIC PESTICIDES USED

<table>
<thead>
<tr>
<th>Active Ingredient</th>
<th>Aquatic Pesticide</th>
<th>Application Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>Glyphosate</td>
<td>Round Up Custom</td>
<td>Surface sprayed</td>
</tr>
</tbody>
</table>

Note: Table 2 will be updated if the District changes aquatic pesticides.

6. AQUATIC PESTICIDE APPLICATION FACTORS

The primary goal is to prevent weed overgrowth whenever possible, which is accomplished through the application of aquatic pesticides. During the irrigation water season, SMWC facilities are visually inspected. When any type of significant weed growth is identified, it is scheduled for treatment.

The threshold for what is considered significant growth can vary between facilities with different cross sectional areas, lengths, and waterline relative to the canal bank. In general, a location will be scheduled for treatment as soon as small patches of weeds are found throughout a particular canal section. This is typically accomplished in conjunction with targeting weeds while they are still in their juvenile phase. By targeting weeds in this manner, the applicator is able to effectively treat the District facilities and use a smaller quantity of aquatic pesticides.
7. MONITORING PLAN

Aquatic pesticide application in SMWC and RD 1500 facilities is in accordance with the regulations of the United States Environmental Protection Agency (USEPA), California EPA (Cal/EPA), Department of Pesticide Regulation (DPR), and the Madera County Department of Agriculture. The pesticide application log shown in Appendix C will be kept by the applicator for each aquatic pesticide application.

The log will contain a minimum of the following criteria:

1) Date and start/stop time
2) Location
3) Name of applicator
4) Water temperature
5) Flow or level of water body
6) Aquatic pesticide application rate and concentration
7) Visual monitoring assessment
8) Certification that the applicator followed the APAP

Samples shall be collected from a minimum of six application events for each active ingredient in each environmental setting (flowing water and non-flowing water, where applicable) per year, except for glyphosate. In the event that there are less than six application events in a year, samples shall be collected during each application event for each active ingredient in each environmental setting (flowing water and non-flowing water, where applicable).

If the results from six consecutive sampling events show concentrations that are less than the receiving water limitation/trigger for an active ingredient in an environmental setting, sampling shall be reduced to one application per for that active ingredient in that environmental setting. If the yearly sampling event shows exceedance of the limitation/trigger for an active ingredient in an environmental setting, then sampling shall return to six application events for that active ingredient in each environmental setting. For glyphosate, samples shall be collected from one application event from each environmental setting (flowing water and non-flowing water, where applicable) per year. A set of three samples will be collected for each representative location.

- Background Monitoring – Background samples shall be collected upstream at the time of the application event, or they may be collected at the treatment area, just prior (up to 24-hours in advance of application) to the application event.

- Event Monitoring – Event monitoring samples shall be collected immediately downstream of the treatment area in flowing waters or adjacent to the treatment area in non-flowing waters, immediately after the application event or shortly after application, but after sufficient time has elapsed such that treated water will have entered the adjacent or downstream area

- Post-Event Monitoring – Post-event monitoring samples shall be collected within the treatment area within one week after application.
A minimum of the following records shall be kept for each representative sample:

- Date and time
- Exact place
- Name(s) of individual(s) who performed the sampling
- Date the analysis was performed
- Name(s) of individual(s) who performed the analysis
- Analytical techniques or methods used
- Results of each analysis

These records are organized in Appendix D.

8. PROCEDURES TO PREVENT SAMPLE CONTAMINATION

Samples shall be collected upstream of potential sources of contamination and will not be in close proximity with application equipment, containers, related vehicles, and protective equipment. Sampling equipment will be thoroughly cleaned before and after each sampling trip, including between samples. Decontamination shall be performed with a detergent that does not leave a residue on sampling equipment, then triple-rinsed with uncontaminated water. The rinse water shall be disposed away from the sampling location.

9. BEST MANAGEMENT PRACTICES (BMPs)

A. SPILL PREVENTION AND ContAINMENT

SMWC and RD 1500 applicators are required to take the necessary precautions ensure the safe handling and transportation of each aquatic pesticide. Application equipment and vehicles are regularly inspected and maintained to identify potential sources or unintended chemical discharges. When applicable, chemicals are mixed at the Company’s yard prior to visiting the application sites.

In the event of an aquatic pesticide spill SMWC and RD 1500 staff will prevent the contaminated water from reaching adjacent water bodies wherever feasible. The use of absorbent granules and pads will be deployed as needed. SMWC and RD 1500 will report spills as required by the local, state, and federal regulations.

B. AQUATIC PESTICIDE APPLICATIONS

All pesticide applicators must either be licensed by the DPR with a valid Qualified Applicator Certificate (QAC) or work under the supervision of someone who is licensed. Qualified applicators will ensure that all equipment is regularly maintained, that application rates are within product label specifications and regulatory requirements, and that only the targeted plants are treated.

Prior to any application of aquatic pesticides, a qualified applicator will visually inspect a site for
weed growth. If weed growth has exceeded the acceptable tolerances, the qualified applicator will determine the appropriate weed treatment. The qualified applicator may also determine the weed treatment based upon the site history and anticipated weed growth.

C. STAFF EDUCATION PLAN

In accordance with the State of California Department of Pesticide Regulation, employees with a Qualified Applicator Certificate are required to maintain 20 hours of continuing education every two years for certificate renewal.

D. PUBLIC NOTICE OF APPLICATIONS

Each calendar year, SMWC and RD 1500 shall notify potentially affected farmers and agencies prior to the first application of aquatic pesticides.

The notifications shall contain a minimum of the following information:

I. Statement of intent to apply aquatic pesticide(s)
II. Name of pesticide(s)
III. Purpose of use
IV. Approximate time period and expected locations of use
V. Applicable water use restrictions and precautions during treatment
VI. Contact information for interested persons to obtain additional information

E. FISH KILL PREVENTION MEASURES

Sutter Mutual Water Company 3 (Tisdale, State Ranch, and Henry Daniel Richter Jr.) pump plants that pump the water from the Sacramento River all have fish screens on them to prevent fish from getting into the system. SMWC and RD 1500 canals are drained on an annual basis after water deliveries are completed. The canals typically remain dry for at least four months a year. To prevent fish kills in the downstream adjacent water bodies, aquatic pesticide applications will be made as far as possible upstream of the discharge location. In general, it is expected that the residual amounts of aquatic pesticides present in the discharged water is not high enough to cause significant fish kills.

F. WEATHER CONDITIONS

Weather conditions will be checked by the qualified applicator before each aquatic pesticide application. The applicator will apply aquatic pesticide during favorable weather conditions to minimize environmental hazards and allow for the effective treatment of weeds. For example, the applicator will not apply pesticide in rainy or windy conditions to avoid pesticide runoff and overspray outside of the target area.

G. EVALUATION EFFECTIVENESS

The effectiveness of BMPs will be evaluated during the aquatic pesticide applications and at the end of each irrigation water season. The water quality data will be reviewed as part of the evaluation process. If aquatic pesticides are detected, the BMPs will be reviewed and modified
as needed. The effectiveness of aquatic pesticides, efficiency of application methods, and field staff organization will also be analyzed annually.
In addition to the aforementioned BMPs the following BMPs are specific to the application.

**H. GLYPHOSATE APPLICATIONS**

The pesticide will be applied only when the wind speed is between 2 and 10 miles per hour. The QAC will setup equipment to produce a large droplet size in order to avoid pesticide drift. An application schedule will be designed to treat small areas at one time, in order to avoid large amounts of decaying vegetation and potential depletion of dissolved oxygen.

**10. ALTERNATIVE CONTROL METHODS**

**I. NO ACTION**

Not controlling the weed and algae population within SMWC and RD 1500 canals is not a feasible alternative. The company’s ability to deliver agricultural water to farmers will be severely diminished and impacts would be manifested in reducing agricultural production in Sutter County. The increased presence of algae in the distribution system will reduce the volume of water that can be delivered and decrease the ability to accurately control water deliveries.

**II. PREVENTION**

SMWC and RD 1500 regularly maintains its canal system when dry through sloping and dipping the bottom and sides of the channels, which includes sediment removal. As a result some aquatic weeds will generally take longer to return due to the soil disturbance and the removal of sandy deposits.

**III. MECHANICAL OR PHYSICAL METHODS**

The SMWC and RD 1500 utilizes mechanical means, including an excavator and grader/sloper, to remove weeds. However, various areas of the distribution system are not easily accessible or do not provide adequate room for safe equipment operation. The excavator and grader/sloper are necessary equipment for other company maintenance. As a result, the equipment is frequently unavailable for daily weed removal. The growth of emergent or shoreline weeds can also be controlled utilizing a tractor with a mower attachment. Mowing is done 4-6 days per week and is limited to locations that are accessible by tractor.

At control structures, trash screens, and road crossings, manual removal of weeds is employed. Manual removal of weeds along canal banks and along the water surface is inefficient and very expensive. In the past the company’s also made an effort to utilize chaining as a method of weed removal, but this method was too expensive to be implemented company-wide.

**IV. CULTURAL METHODS**
SMWC and RD 1500 applicators monitor weed populations to determine optimum application periods. By making applications during specific weed growth stages, a reduced application rate is required to maintain the population below the desired threshold. Due to the nature of the on demand water distribution system, it is typically not feasible to manage canal water levels as a method of weed control.

### V. BIOLOGICAL CONTROL AGENTS

Biological control methods such as fish, goats, and sheep are not feasible for widespread use in or around Company canals. Given that the canal system is typically drained for at least four months per year, it does not provide suitable habitat for fish. Goat and sheep grazing for emergent and terrestrial weeds is limited by the lack of fencing limits, vehicle traffic, and high maintenance costs.

### VI. ALGAECIDES AND AQUATIC HERBICIDES

Due to the very limited feasible alternatives mentioned in the previous sections, MID has decided to continue to use aquatic pesticides as a primary method of treating weed and algae populations.

1) **APPLICATION METHODS**

The district applies aquatic pesticides based on manufacturer recommendations. These methods are typically unobtrusive and require only one or two applicators in a single vehicle along a canal bank. Table 2 includes the application methods used for each aquatic pesticide.

2) **DECISION MATRIX**

Due to the variety of aquatic pesticides applied, and various factors that influence applications (canal flow, temperature, target weeds etc.) it is not feasible to apply a traditional decision matrix. The site conditions can very significantly each day, which requires diligent evaluation by district applicators.

### APPENDICES

Appendix A – SMWC and RD 1500 Distribution System

Appendix B – Aquatic Pesticides Application Log

Appendix C – Aquatic Pesticides Field Monitoring & Sampling Form

Appendix D – Sample Public Notice Letter
# Aquatic Pesticide Application Log

<table>
<thead>
<tr>
<th>DATE</th>
<th>Number of Applications</th>
<th>PESTICIDE</th>
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Application Supervisor: ___________________________

Program Manager: _____________________________

Notes:
# APPENDIX C – AQUATIC PESTICIDES FIELD MONITORING & SAMPLING FORM

## Aquatic Pesticide Field Monitoring & Sampling Form

### (Page 1 of 2)

**Sampler Name:**

**Sample #1: Background Monitoring within Treatment Area**

<table>
<thead>
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<th>Date:</th>
<th>Time:</th>
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**Aquatic Pesticide Applied:**

**Sample ID:**

**Approx. Water Speed (ft/s):**

**Site Description:**

**Sheen:** Yes No

**Color:** None Brown Green Other:

**Weather (Fog, Rain, Wind, etc.):**

**Temperature (°C):**

**Turbidity (NTU):**

**Electrical Conductivity (mho/cm):**

**pH:**

**Dissolved Oxygen (mg/L):**

**Sample #2: Event Monitoring Downstream**

<table>
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<th>Date:</th>
<th>Time:</th>
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**Aquatic Pesticide Applied:**

**Sample ID:**

**Site Description:**

**Sheen:** Yes No

**Approx. Water Speed (ft/s):**

**Color:** None Brown Green Other:

**Weather (Fog, Rain, Wind, etc.):**

**Temperature (°C):**

**Turbidity (NTU):**

**Electrical Conductivity (mho/cm):**

**pH:**

**Dissolved Oxygen (mg/L):**
<table>
<thead>
<tr>
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<tbody>
<tr>
<td>Sampler Name: ____________________________</td>
</tr>
</tbody>
</table>

| Sample #3: Post-Event Monitoring within Treatment Area          | Date: __________ | Time: __________ |
|---------------------------------------------------------------|------------------|
| Aquatic Pesticide Applied:                                    |                  |
| Sample ID: __________ | Approx. Water Speed (ft/s): |
| Site Description:                                            |                  |
| Sheen: Yes No                                                 |                  |
| Color: None Brown Green Other:                                |                  |
| Weather (Fog, Rain, Wind, etc.):                              |                  |
| Temperature (°C): __________ | Turbidity (NTU): |
| Electrical Conductivity (mho/cm):                             | pH:              |
| Dissolved Oxygen (mg/L):                                      |                  |

| Sample #4: Post-Event Monitoring Downstream                    | Date: __________ | Time: __________ |
|---------------------------------------------------------------|------------------|
| Aquatic Pesticide Applied:                                    |                  |
| Sample ID: __________ | Approx. Water Speed (ft/s): |
| Site Description:                                            |                  |
| Sheen: Yes No                                                 |                  |
| Color: None Brown Green Other:                                |                  |
| Weather (Fog, Rain, Wind, etc.):                              |                  |
| Temperature (°C): __________ | Turbidity (NTU): |
| Electrical Conductivity (mho/cm):                             | pH:              |
| Dissolved Oxygen (mg/L):                                      |                  |
March 1, 2014

Agency Name
Attn: Staff Name
Address Line 1
Address Line 2

Dear Staff Name,

Sutter Mutual Water Company and RD 1500 intends to apply aquatic pesticides to Company facilities for weed control. The approximate period of application will be from (starting month) through (ending month). The pesticides being applied are as follows:

   Round Up Custom

All persons should avoid contact with shoreline weeds and irrigation water during this period to avoid potentially harmful effects. Please contact the Sutter Mutual Water Company or RD 1500 with any additional questions.

Sincerely,

Richard Webb
Operations Manager
Sutter Mutual Water Company

Jack Bailey
Operations Manager
R.D. 1500