



March 24, 2017

Mr. Adam Laputz
Assistant Executive Officer
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95624

Subject: Proposed Amendments to the Basin Plan for the Control of Pyrethroid Pesticides Discharges Draft Staff Report, January 2017

Dear Mr. Laputz,

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to provide comments on the Proposed Amendments to the Basin Plan for the Control of Pyrethroid Pesticides Discharges (BPA) Draft Staff Report (January 2017). CASA represents more than 100 local public wastewater agencies engaged in collecting, treating, and recycling wastewater and high quality biosolids to ensure the protection of public health and the environment. Collectively, our agencies serve over 90 percent of the sewered population of California.

CASA reviewed the draft staff report and attended the February 24, 2017 Central Valley Regional Water Quality Control Board (Central Valley Water Board) hearing on the proposed BPA. CASA appreciates the effort made by Central Valley Water Board staff in developing the proposed BPA, their willingness to engage with stakeholders through this process to understand the challenges that are faced by wastewater agencies in regulating pyrethroids, and identify potential solutions that may help mitigate those concerns and impacts on wastewater agencies.

In general, CASA is supportive of the proposed implementation approach for the BPA that allows for two years to collect additional information and data so that several outstanding questions related to pyrethroid pesticides, their prevalence, fate, and impact on the receiving waters may be answered. As discussed in prior comment letters and during various workshops, CASA believes that the water quality criteria for the pyrethroid pesticides developed by the University of California, Davis may be overly stringent because multiple conservative assumptions were made and safety factors were included where there were insufficient data available to meet the minimum requirements of the methodology used to develop the proposed water quality criteria. It is critical that future water quality objectives are scientifically- and technically-based because they can have significant impacts on wastewater agencies. These impacts can include mandatory minimum penalties and other legal actions for compounds that wastewater agencies have limited ability to control, such as the use of

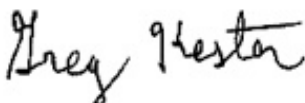
pyrethroid pesticides from private users, and to treat or remove these compounds from wastewater.

During the Central Valley Water Board hearing on February 24, 2017, staff outlined the schedule for implementing the proposed BPA including a review of the proposed BPA in Year 15, or potentially earlier if necessary. This review is intended to evaluate and consider new data collected during this implementation period and determine if the proposed water quality triggers are sufficiently protective of aquatic life. Staff indicated that future water quality objectives may be lower than the proposed water quality triggers if future data and information indicate that it is necessary to do so. CASA wants staff to also consider that future water quality objectives may also be higher than the proposed water quality triggers if future data and information indicate that such objectives would still be protective of water quality and aquatic life. As more information and data are developed to better understand the science, it is expected that the conservative assumptions and safety factors would be reduced.

CASA understands the increasingly complex challenges that we all face in protecting public and environmental health while providing reasonable protection of beneficial uses. CASA is committed to collaboratively working with its members, regulatory agencies, and other stakeholders in achieving these goals with technically- and scientifically-sound standards and policies. As new chemicals emerge, the science behind the effects of these chemicals on the environment is sometimes not fully understood. That said, the need exists to use consistent and reliable methods and adequate scientific information in the process of establishing enforceable water quality standards in accordance with the requirements of the California Water Code.

CASA appreciates this opportunity to provide comments on the proposed BPA and we look forward to working with you as this process moves forward. If you have any questions or wish to discuss our perspective further, please contact me at (916) 844-5262. Thank you for consideration of our comments.

Sincerely,



Greg Kester
Director of Renewable Resource Programs

cc: Pamela Creedon – Executive Officer, CVRWQCB