



March 24, 2017

Tessa L. Fojut, Ph.D.
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670
Tessa.Fojut@waterboards.ca.gov

Re: Proposed Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins for the Control of Pyrethroid Pesticides Discharges

Dear Dr. Fojut:

The Western Plant Health Association (WPHA) appreciates the opportunity to provide comments on the Proposed Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins for the Control of Pyrethroid Pesticides Discharges (Draft Amendments) and the associated Draft Staff Report. We have been active participants in the Central Valley Regional Water Quality Control Board's (Central Valley Water Board) stakeholder process, and appreciate the open and transparent way in which the Draft Amendments were developed. WPHA is a non-profit organization that works to promote the environmentally safe and agronomically sound use of plant health products for the production of safe and high quality food, fiber, and horticultural products in California, Hawaii, and Arizona.

The WPHA joins the Pyrethroid Working Group (PWG) in its comments with respect to the Draft Amendments and the Draft Staff Report. WPHA agrees with the PWG that there is insufficient information available to adopt water quality objectives at this time, and thus generally supports the staff recommended pesticide control program contained within the Draft Amendments, which would establish numeric triggers for the implementation of management plans. WPHA also agrees that use of 5th percentile values for the establishment of pyrethroid concentration goals are extremely conservative, and thus are protective of aquatic life beneficial uses. There is no compelling reason or justification for use of values that are below those at the 5th percentile level.

Moreover, WPHA supports the phased approach contained within the Draft Amendments. Pyrethroids are extremely beneficial products for the protection of public health and agriculture, and their beneficial uses must be weighed against their impacts to the environment. At this time, it has been shown that pyrethroids may cause toxicity to laboratory reared *Hyalella azteca*; however, it is not known if impacts to laboratory *Hyalella* actually constitute an unreasonable impact to aquatic life beneficial uses. Until additional data and information is available, the Central Valley Water Board should avoid the premature adoption of water quality objectives, and avoid adoption of an implementation program that would negatively impact public health and agriculture by causing the pyrethroids to no longer be available products. We believe that the Draft Amendments strike this appropriate balance.

WPHA supports and references the detailed comments submitted by the Pyrethroid Working Group for your consideration, and thanks the Central Valley Water Board and its staff for the balanced approach they have brought to this issue. We look forward to continuing to participate in these discussions and thank you for your consideration of our comments. If you have any questions, please feel free to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Pinel', with a stylized flourish at the end.

Renee Pinel
President/CEO