



December 1, 2014

Via Electronic Submission

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

RE: Comments on October 2014 Preliminary Draft Pyrethroid Basin Plan Amendment

Dear Ms. Fojut:

The Western Plant Health Association (WPHA) appreciates the opportunity to comment on the October 2014 Preliminary Draft Pyrethroid Basin Plan Amendment. WPHA represents the interests of crop protection and fertilizer manufacturers, agricultural biotechnology providers, and agricultural retailers in California, Arizona, and Hawaii.

This letter serves to support the technical and more comprehensive comments provided by Somach Simmons & Dunn on behalf of the Pyrethroid Working Group (PWG). We share in their concerns with respect to the overly conservative objectives resulting from the use of sensitive laboratory species without consideration of environmentally relevant field data, the absence of a bioavailability assessment, improper use of the water quality criteria in the additivity formula, and inappropriate use of the UCD criteria reports and resulting Acute to Chronic Ratio.

We support the PWG's belief that questions developed for peer review should be scientific and technical in nature, and should not include policy questions reserved for the Central Valley Regional Water Quality Control Board. The recommended questions proposed by PWG are science based and would provide Board staff with the objective assessment they are seeking on the proposed amendment.

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Thank you for your consideration of our comments. We look forward to future discussions on this amendment. If you have any questions, please contact me at (916) 574-9744.

Sincerely,

A handwritten signature in cursive script that reads "Rachel Kubiak". The ink is dark and the handwriting is fluid and legible.

Rachel Kubiak
Director of Environmental and Regulatory Affairs