

December 6, 2012

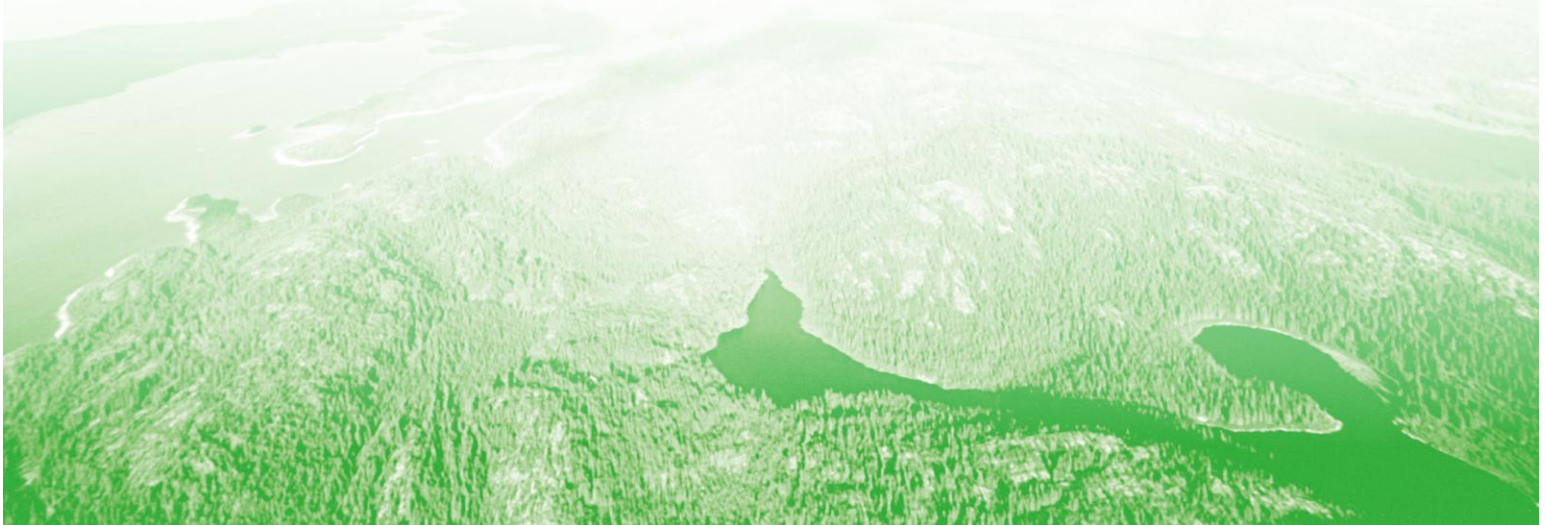
Mr. Danny McClure
Dr. Tessa Fojut
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

Dear Mr. McClure,

My apologies for the late submission of comments on the material provided at the October 30, 2012 scoping meeting for the Central Valley Pyrethroid Total Maximum Daily Load and Basin Plan Amendment, the East San Joaquin Water Quality Coalition and the San Joaquin County and Delta Water Quality Coalition are providing comments on the documents provided at the meeting. Even if the comments cannot be included in the administrative record, the Coalitions hope that staff will consider the comments below as they move forward with the TMDL/BPA process.

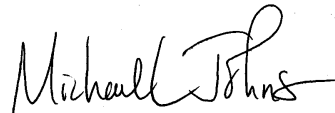
The Coalitions encourage staff to more fully develop the alternatives prior to proceeding with the TMDL development process. Specifically, the scoping document states that there is ongoing work to develop the remaining acute and chronic objectives for esfenvalerate and that staff are considering a fifth alternative of a combined toxic units approach. But, the description of the alternative indicates that any of the objectives proposed for the other alternatives could be used as the benchmark by which toxic units are calculated.

The Coalitions are concerned that the process will move forward with evaluation of the alternatives even though the alternatives are not developed sufficiently to allow an adequate evaluation of the impacts on irrigated agriculture. The toxic unit approach is currently used for the chlorpyrifos and diazinon objective. Even though an exceedance is based on the sum of the two concentrations not exceeding 1 TU, in practice due to differential use of the two products, the chlorpyrifos objective drives exceedances in the Coalition regions. In the Coalition regions, there is differential use of the pyrethroids listed in Table 1 of the scoping document providing the possibility that esfenvalerate could be particularly critical in determining exceedances under alternatives 3 and 5. This in turn does not allow a thorough determination of the economic impacts of these objectives on irrigated agriculture.



The Coalitions hope that the process does not move forward until the esfenvalerate objective is fully developed and vetted.

Sincerely

A handwritten signature in black ink that reads "Michael L. Johnson". The signature is written in a cursive style with a large, looped initial "M".

Michael L. Johnson



