

May 21, 2014

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-2000



Re: **Comment Letter-- Santa Maria River Watershed--Toxicity and Pesticides TMDLs**

Dear Ms. Townsend:

U.S. Environmental Protection Agency (EPA) recommends and supports the State Board's adoption of the proposed Toxicity and Pesticides Total Maximum Daily Loads (TMDLs) for the Santa Maria River Watershed. These TMDLs address the full range of pesticides in the Santa Maria River Watershed, including organophosphates, pyrethroids, and legacy pesticides in the organochloride class. We applaud the inclusion of toxicity targets and TMDLs for the water column, sediment, and fish tissue, to address known, unknown and future impairments due to pesticides and other pollutants. We appreciate that you have included numeric targets equivalent to the water quality objectives for acute and chronic conditions, and for additive conditions (i.e., adding the effects of two or more pesticides when present concurrently in a water body). Extensive scientific evidence shows pesticide compounds within the same class will have a combined, additive effect. Therefore, it is necessary and important to address these issues.

These TMDLs are toxicity- and concentration-based, which is appropriate for these compounds. EPA supports the analysis used to develop the TMDLs, which are scientifically sound and rigorously peer-reviewed. They are consistent with EPA water quality guidelines for the pesticides identified.

We look forward to reviewing your final TMDLs when they are submitted to EPA. If you have additional questions or need clarification on the comments above, please call me at (415) 972-3456.

Sincerely,

Janet Parrish  
TMDL Liaison

Cc: Peter Meertens, CCRWQCB  
Chris Rose, CCRWQCB

Enclosure

Janet Parrish  
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