



November 2, 2017

Via Electronic Mail

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
commentletters@waterboards.ca.gov

SUBJECT: Comment Letter – Central Valley Pyrethroids

Dear Ms. Townsend:

The Western Plant Health Association (WPHA) appreciates the opportunity to comment on *Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins for the Control of Pyrethroid Pesticides Discharges* (Pyrethroid Amendment). WPHA represents the interests of crop protection and fertilizer manufacturers, agricultural biotechnology providers, and agricultural retailers in California, Arizona, and Hawaii.

WPHA participated in the Central Valley Regional Water Quality Control Board's (Central Valley Water Board) process and provided comments on the Pyrethroid Amendment. Thus, we have met the requirements of the California Code of Regulations, title 23, section 3779, subdivision (f), as directed in the State Water Resources Control Board's (State Water Board) Notice of Opportunity to Comment. Our comments are directed to the final version of the Pyrethroid Amendment as adopted by Central Valley Water Board on June 8, 2017.

In summary, WPHA submits this letter in support of the Central Valley Water Board's actions and encourages the State Water Board to approve the Pyrethroid Amendment as adopted by the Central Valley Water Board. Further, WPHA joins the Pyrethroid Working Group (PWG) in their comments with respect to the Pyrethroid Amendment. We agree with the PWG that the Central Valley Water Board action to use triggers rather than water quality objectives, use 5th percentiles as concentration goals, and direct use of the bioavailable portion for calculation of the

numeric triggers are appropriate and reasonable actions as compared to other more conservative alternatives considered by the Central Valley Water Board.

Accordingly, we request State Water Board approval of the Pyrethroid Amendment. WPHA appreciates your consideration of our comments. If you have any questions, please feel free to contact me at (916) 574-9744, or reneep@healthyplants.org.

Sincerely,

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

Renee Pinel
President