



June 9, 2014

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100
Via E-mail: commentletters@waterboards.ca.gov

SUBJECT: Comment Letter – Proposed amendments to Water Quality Order 2011-0002-DWQ Statewide General Vector Control Permit for Residual Adulticide and Larvicide Pesticide Discharges (Vector Control Permit)

On behalf of Clean Water Action and our approximately 50,000 California members, I am writing today in support of the comments submitted by the Bay Area Clean Water Agencies (BACWA) in regard to the Statewide General Vector Control Permit cited above.

It is imperative to remember that preserving water quality and meeting standards for which NPDES permits have been developed to maintain is, like vector control, a public health priority. Consequently, we cannot protect the public from one problem, while putting them and the environment at risk by another. For this reason, we share BACWA's concern over the elimination of water quality monitoring requirements in the March 12, 2014 amendment (2014-0038-EXEC) and removal of effective NPDES regulatory limits on the choices of pesticides available in both past amendments and the current proposed amendments.

In effect, these flaws in the proposed permit creates the risk of water quality degradation, increased costs in terms of eventual cleanup costs to meet water quality standards, and additional expense to wastewater and other agencies that must meet those standards.

Clean Water Action therefore asks the State Board to ensure that we put in adequate protections in the vector control permit that protects the public and the environment both from dangerous pests and our water quality objectives.

Sincerely,

A handwritten signature in black ink that reads "Andria Ventura".

Toxics Program Manager

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