
Central Valley Regional Water Quality Control Board

12 September 2024

Tim Ashlock
Buena Vista Coalition
P.O. Box 756
Buttonwillow, CA 93206

CONDITIONAL APPROVAL OF THE BUENA VISTA COALITION PESTICIDE MONITORING PROPOSAL FOR THE 2025 WATER YEAR

Thank you for your submittal of **Buena Vista Coalition's** 2025 Water Year Pesticide Evaluation Protocol Proposal (Proposal), dated 2 August 2024. The proposed pesticides and schedules for surface water monitoring were identified based on guidance provided in the Pesticide Evaluation Protocol, as required by the Monitoring and Reporting Program for Waste Discharge Requirements General Order R5-2013-0120-09.

Based on Central Valley Water Board staff review, the proposed monitoring constituents and schedule were appropriately identified, except for Clothianidin. I am approving the proposal under the condition that the monitoring schedule is revised to include this pesticide during the month of April.

The enclosed memorandum provides additional details regarding staff's review of the 2025 Proposal. If you have any questions regarding this letter, please contact Mathew Jian at (559) 445-5567, or by email at Mathew.Jian@waterboards.ca.gov.



For Patrick Pulupa
Executive Officer

Enclosure: Staff Review of **Buena Vista Coalition's** Pesticide Evaluation Protocol Proposal for the 2025 Water Year



Central Valley Regional Water Quality Control Board

TO: Eric Warren, PE
Senior Water Resource Control Engineer
IRRIGATED LANDS REGULATORY PROGRAM

FROM: Mathew Jian
Water Resource Control Engineer
IRRIGATED LANDS REGULATORY PROGRAM

DATE: 12 September 2024

**SUBJECT: REVIEW OF BUENA VISTA COALITION'S PESTICIDE EVALUATION
PROTOCOL PROPOSAL FOR THE 2025 WATER YEAR**

On 2 August 2024, the Buena Vista Coalition (Coalition) submitted a Pesticide Evaluation Protocol Proposal for the 2025 Water Year (Proposal) to the Central Valley Water Board. Monitoring proposals are submitted annually in accordance with the Monitoring and Reporting Program (MRP) for Waste Discharge Requirements General Order R5-2013-0120-09. The Proposal identifies the constituents and schedule for pesticide monitoring at designated surface water monitoring sites from 1 October 2024 through 30 September 2025.

Staff reviewed the Proposal to determine compliance with the requirements of the MRP. A summary of the main elements of the monitoring proposal is provided below, followed by staff comments and recommendations.

2025 MONITORING PROPOSAL SUMMARY

The pesticides selected for monitoring were determined using three years of the Department of Pesticide Regulation's (DPR) Pesticide Use Report (PUR) data (2019-2021). Pesticides that were applied within the watershed areas were filtered based on the Executive Officer List of Pesticides for Consideration (Attachment A, Pesticide Evaluation Protocol [PEP] issued by the Central Valley Water Board on 21 February 2024). If applicable, degradates of parent pesticides were added to the evaluation list. Lastly, pesticides with the same toxicant in water were grouped together. Pesticides applied within the watershed areas were excluded from monitoring based on factors including environmental fate and transport properties (e.g., high volatility), calculation of an aquatic life risk ratio of less than 50, and absence of commercially available analytical methods.

The pesticides proposed for monitoring are summarized in Table 1 of the Proposal. Figure 1 of the Proposal shows the location of the two surface water monitoring sites.

STAFF COMMENTS AND RECOMMENDATIONS

Based on staff review of the PEP process, staff recommends that Clothianidin be included for monitoring in the month of April. Step 1.E. of the PEP states, *“Determine if any parent compounds on the EO list of degradates (Attachment A1), have reported usage. Add degradates to the list in the same amount as the pounds of applied parent.”* Clothianidin is a degradate pesticide of the parent pesticide Thiamethoxam, which had reported usage based on the Coalition’s submitted PUR data for the month of April.