



November 1, 2017

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Dear Ms. Townsend:

On behalf of the Mosquito and Vector Control Association of California (MVCAC), which represents more than 65 special districts, other subdivisions of local government, and the state of California responsible for mosquito and vector control, we appreciate the opportunity to comment on the proposed approval of an amendment to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins with respect to pyrethroid pesticide discharges.

MVCAC and its member districts and agencies have a mandate to protect public health from threats of disease carrying mosquitoes that cause West Nile, yellow fever, Zika and other emerging vectors. At the same time, we recognize the State Water Resources Control Board's and the regional water quality control boards' duty is to protect water quality objectives and beneficial uses. Since 2016, mosquito districts have been operating under a revised Vector Control Permit as part of their NPDES requirements which recognize our public health imperative. The Vector Control Permit allows districts, as approved by the State Water Board Executive Director, to have a regulatory exception in meeting certain discharge requirements, including for certain active ingredients registered by the California Department of Pesticide Regulation.

To that end, we are pleased that the proposed amendment to the Water Quality Control Plan recognizes our public health imperative by acknowledging, as specified on Page 17 of Resolution R5-2017-0057, that "discharges of pyrethroids from vector control applications are subject to *Statewide NPDES Permit for Biological and Residual Discharges to waters of the United States from Vector Control Applications.*" As a result, "vector control discharges are not subject to any additional implementation provisions for attainment of the pyrethroid triggers or TMDLs for pyrethroids." We agree with this conclusion as the State Water Board moves forward in adopting a revised Water Quality Plan for the Sacramento River and San Joaquin River Basins. We believe this is the appropriate path forward in balancing the needs to protect public health while ensuring protection of water quality objectives.

Sincerely,

A handwritten signature in black ink that reads "Brian White". The signature is written in a cursive, flowing style.

Brian White