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## Central Valley Regional Water Quality Control Board

15 February 2023

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### **REVISION OF THE PYRETHROID MANAGEMENT PLAN NEEDED FOR FRESNO METROPOLITAN FLOOD CONTROL DISTRICT, CITY OF FRESNO, CITY OF CLOVIS, AND COUNTY OF FRESNO AND SUBMITTAL DEADLINE EXTENSION**

On 25 October 2022, the Fresno Metropolitan Flood Control District, City of Fresno, City of Clovis, and the County of Fresno (Permittees) submitted a Pyrethroid Management Plan (Plan) to comply with the requirements established by the Amendment to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins for the Control of Pyrethroid Pesticide Discharges (Resolution R5-2017-0057) (Pyrethroid Control Program) and the 13 July 2020 Order to submit technical and monitoring reports pursuant to California Water Code Sections 13267 and 13383 issued to the Permittees (Order).

The Pyrethroid Control Program and Order require that the Plan identify a set of management practices that, taken as a whole, may be reasonably expected to effectively reduce pyrethroid levels in discharges. The Pyrethroid Control Program and Order also list management practices which must be considered for inclusion in a Plan and require justification regarding the discharger's decision whether to select or not select each practice listed. A Plan is also required to include a description of progress reporting, description of adaptive management, and consideration of replacement insecticides for pyrethroids.

Central Valley Water Board staff reviewed the Permittees' Plan and determined that it does not meet the applicable Pyrethroid Control Program and Order requirements, specifically Order Section 2, Item D.1.ii.2. The corresponding section of the Permittees' Plan require revisions before the Plan may be approved.

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MARK BRADFORD, CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

The Permittees' Plan proposed a timeline of one year after receipt of approval of the Plan to address Order Section 2, Item D.1.ii.2. The Permittees' proposal is inadequate to fulfill this section of the Order, which requires a finalized Integrated Pest Management Policy (IPM Policy) to be included at the time of the Plan submittal. Central Valley Water Board staff is interpreting the Permittees' proposal as a request for an extension to submit a complete, revised Plan, including a finalized IPM Policy. Considering the observed exceedance in the Permittees' discharge during baseline monitoring, the proposed extension would be a significant delay in addressing potential impacts of pyrethroid pesticides to aquatic life from the Permittees' stormwater discharges.

Pursuant to the Pyrethroid Control Program and through this letter, I am extending the Plan submittal deadline to **1 November 2023** so that the Permittees may submit a revised Plan, including a final IPM Policy for review and approval.

**The Permittees' revised Plan must be submitted to the Stormwater Multiple Application Tracking System (SMARTS) database on or before 1 November 2023 to comply with the Pyrethroid Control Program and Order.** If the revised Plan is not submitted by 1 November 2023, the Board may pursue enforcement, including potential monetary liability.

The Permittees shall begin implementing the Plan within 30 days after receipt of written approval.

For more detailed feedback on the required revisions, please contact Jessica Rader at (916) 464 – 3199 or [jessica.rader@waterboards.ca.gov](mailto:jessica.rader@waterboards.ca.gov).

Sincerely,

Patrick Pulupa  
Executive Officer

cc: Bryan Smith, Central Valley Water Board, Redding  
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