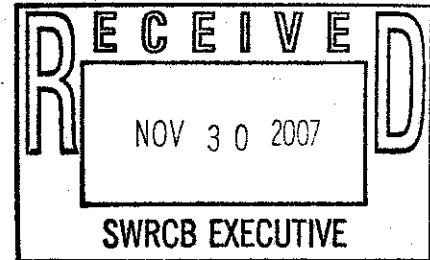




VIA ELECTRONIC MAIL: commentletters@waterboards.ca.gov

November 30, 2007

Ms. Jeanine Townsend
Acting Clerk to the Board
Executive Office
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



**Re: Draft Staff Report Water Quality Control Plan for Enclosed Bays and Estuaries –
Part 1 Sediment Quality**

Dear Ms. Townsend:

On behalf of the Pyrethroid Working Group (PWG), I appreciate this opportunity to comment on the State Water Resources Control Board's (SWRCB) report entitled "Draft Staff Report Water Quality Control Plan for Enclosed Bays and Estuaries – Part 1 Sediment Quality" dated September 27, 2007, which proposes a strategy to address sediment quality in enclosed embayments and estuaries of California. The PWG is a task force comprised of basic manufacturers of synthetic pyrethroid insecticides. The purpose of the PWG is to develop data to support registration of synthetic pyrethroid products in the US. Member companies are Bayer, DuPont, FMC, Pytech (a joint venture of Cheminova and Dow AgroSciences), Syngenta, and Valent.

The PWG fully supports the multiple lines of evidence approach proposed in the draft report and recommends it be adopted statewide for consistency in regulatory programs. We also endorse and are in agreement with the general and detailed comments on the draft report submitted by the Western Plant Health Association.

Sincerely,

A handwritten signature in black ink that reads "Nicholas N. Poletika".

Nicholas N. Poletika, Ph.D.
Science Leader
Dow AgroSciences LLC