



Central Valley Regional Water Quality Control Board

12 September 2024

Donald Ikemiya
Kaweah Basin Water Quality Association
P.O. Box 2840
Visalia, CA 93279

CONDITIONAL APPROVAL OF KAWEAH BASIN WATER QUALITY ASSOCIATION PESTICIDE MONITORING PROPOSAL FOR THE 2025 WATER YEAR

Thank you for your submittal of Kaweah Basin Water Quality Association'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 the enclosed staff memorandum, 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 months of July, August, and October.

The enclosed memorandum provides additional details regarding staff's review of the 2025 Proposal. If you have any questions regarding this letter, please contact Christine Johnson at (559) 445-6051, or by email at Christine.Johnson@Waterboards.ca.gov.

A handwritten signature in blue ink, appearing to read "Patrick Pulupa".

For Patrick Pulupa
Executive Officer

Enclosure: Staff Review of Kaweah Basin Water Quality Association'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: Christine Johnson
Environmental Scientist
IRRIGATED LANDS REGULATORY PROGRAM

DATE: 12 September 2024

**SUBJECT: REVIEW OF THE KAWEAH BASIN WATER QUALITY ASSOCIATION'S
SURFACE WATER PESTICIDE EVALUATION PROTOCOL PROPOSAL –
2025 WATER YEAR UPDATE**

On 2 August 2024, the Kaweah Basin Water Quality Association (Coalition) submitted a Pesticide Evaluation Protocol Proposal (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 recommendation.

2025 MONITORING PLAN UPDATE SUMMARY

Monitoring Sites, Parameters, and Schedule

Pesticide monitoring is scheduled at Yokhol Creek sub-watershed for the 2025 water year. Sub-watersheds are monitored for Assessment parameters (including pesticides) on a **three-year rotational basis as defined in the Coalition's Surface Water Monitoring Plan (SWMP)**. The constituents selected for monitoring were determined using three years of Pesticide Use Report data (2019-2021) as required by the Pesticide Evaluation Protocol (PEP). Pesticide application records for the watersheds were filtered to only chemicals included in the Executive Officer List of Pesticides for Consideration (Attachment A, PEP). Application records for the Yokhol Creek watershed were

organized according to the pesticide groups provided in the Protocol and assessed relative to aquatic life and human health reference values.

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 or human health risk ratio of less than 10, or the absence of commercially available analytical methods.

STAFF COMMENTS AND RECOMMENDATIONS

Water Board staff noted that Clothianidin was not included in the Coalition's Monitoring Proposal. Step 1E. of the Pesticide Evaluation Process indicates to, "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 the degradate pesticide of the parent pesticide Thiamethoxam, which is **included in the Coalition's Proposal. Upon review, Water Board Staff found that** Clothianidin should be monitored in July, August, and October and was not included in the Monitoring Proposal. Therefore, the Proposal should be revised to include monitoring for Clothianidin at Yokohl Creek in the specified months.

The Proposal executed the steps outlined in the Pesticide Evaluation Protocol and complies with the requirements of the MRP. Staff recommends approval of the Proposal for pesticide monitoring from 1 October 2024 through 30 September 2025 with the condition that Clothianidin is added as a constituent to be monitored at Yokohl Creek in July, August, and October.