



Central Valley Regional Water Quality Control Board

14 June 2024

Tim Johnson
California Rice Commission
1231 I Street, Suite 205
Sacramento, CA 95814-2933

APPROVAL OF THE CALIFORNIA RICE COMMISSION SURFACE WATER QUALITY MANAGEMENT PLAN FOR PYRETHROIDS

Thank you for your submittal of the Surface Water Quality Management Plan for Pyrethroids (Pyrethroid SQMP) on 19 April 2024. The Pyrethroid SQMP was developed to satisfy the requirements of Order R5-2014-0032-03 to address exceedances of an applicable water quality objective. Your submittal describes your approach for addressing lambda-cyhalothrin and sediment toxicity exceedances.

The Pyrethroid SQMP outlines continued monitoring and outreach efforts that are planned for implementation to address the exceedances of lambda-cyhalothrin at Colusa Basin Drain #5 and sediment toxicity at Sacramento Slough Bridge near Karnak. Management Practice Implementation Reporting will also occur beginning in 2025. The form that will be used by rice growers subject to this management plan must be submitted for approval prior to use.

Based on the attached staff review, the California Rice Commission has satisfied the requirements for development of a management plan with this submittal. I approve the Pyrethroid SQMP. If you have any questions or comments regarding this review, please contact Ashley Peters at Ashley.Peters@waterboards.ca.gov.

Sincerely,

Adam Laputz
Digitally signed by Adam Laputz
Date: 2024.06.14 16:12:46 -0700
Water Boards

Patrick Pulupa
Executive Officer

Cc: Craig Riddle, California Rice Commission

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

Central Valley Regional Water Quality Control Board

TO: Petra Lee
Senior Environmental Scientist
IRRIGATED LANDS REGULATORY PROGRAM

FROM: Ashley Peters, PE
Water Resource Control Engineer
IRRIGATED LANDS REGULATORY PROGRAM

DATE: 31 May 2024

SUBJECT: REVIEW OF THE CALIFORNIA RICE COMMISSION SURFACE WATER QUALITY MANAGEMENT PLAN FOR PYRETHROIDS

On 19 April 2024, the California Rice Commission submitted a Surface Water Quality Management Plan for Pyrethroids (Pyrethroid SQMP). Waste Discharge Requirements General Order for Sacramento Valley Rice Growers, Order R5-2014-0032-03 (Order), requires that a surface water quality management plan be developed where an applicable water quality objective is exceeded twice in a three-year period at a monitoring location and rice lands may cause or contribute to the exceedances. The Pyrethroid SQMP was developed to satisfy the surface water quality management plan requirements outlined in the Order for pyrethroids at Colusa Basin Drain #5 (CBD5) and sediment toxicity at Sacramento Slough Bridge near Karnak (SSB).

A summary of the Pyrethroid SQMP is provided below along with a review of the components required by the Order. The submittal was released for a 30-day public comment period during which no comments were received. Based on the staff review, the Pyrethroid SQMP is recommended for approval.

Pyrethroid SQMP Summary

The Pyrethroid SQMP was developed to address exceedances of the pyrethroid concentration goal unit (CGU) established as a water quality objective by the Central Valley Water Board's 2019 Basin Plan Amendment for the Control of Pyrethroid Discharges. The CGU accounts for contributions of six pyrethroids, although only two are registered for use on rice and only lambda-cyhalothrin is used on enough acreage that it was included for baseline monitoring. The Pyrethroid SQMP also addresses sediment toxicity.

Baseline monitoring for pyrethroids, specifically lambda-cyhalothrin, was completed at the four primary receiving water sites for rice. Exceedances of the acute CGU occurred at site CBD5 in 2021 and of the chronic CGU in 2021 and 2023 triggering development

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of a management plan for site CBD5 in 2023. Monitoring for sediment toxicity was also completed in 2023 with two exceedances occurring at site SSB in 2023 triggering a sediment toxicity management plan for site SSB. Both the pyrethroid exceedances at site CBD5 and the sediment toxicity exceedances at site SSB are addressed by the Pyrethroid SQMP. Table 1 summarizes the exceedances.

Table 1: Exceedances Triggering Management Plans

Date	Site	CGU (acute)	CGU (chronic)	Sediment Toxicity <i>H. Azteca</i> (mean % survival)
6/13/23	SSB	NE	NE	1.3
7/18/23	SSB	NE	NE	3.8
5/4/21	CBD5	1.3	3.04	NE
5/30/23	CBD5	NE	1.91	NE

Notes:

NE = no exceedance

The approach outlined in the Pyrethroid SQMP for addressing the constituents of concern primarily focuses on outreach including general outreach and focused outreach; targeted outreach will be implemented if the prior two outreach efforts have not resulted in improvements. General outreach entails increased communication to all Sacramento Valley rice growers about the proper use of and best management practices for lambda-cyhalothrin. Focused outreach will target growers in the sites CBD5 and SSB subwatersheds using direct mailings to those applying lambda-cyhalothrin with additional information regarding application timing and rates, water hold times, and management practices. Targeted outreach would involve direct contact with specific growers if continued exceedances and toxicity are observed after two years of general and focused outreach.

A Management Practice Implementation Report (MPIR) is also triggered for all rice growers in the subwatersheds covered by the Pyrethroid SQMP. Growers will begin submitting MPIRs in fall 2025 to allow outreach to occur prior to reporting. A Management Plan Progress Report will be submitted to the Regional Board by 1 May, annually, summarizing the implementation efforts under the Pyrethroid SQMP during the prior year. Monitoring results will be provided in the 31 December Annual Monitoring Report.

Staff Review Comments

The Pyrethroid SQMP generally satisfies the requirements for a surface water quality management plan identified by the Order. The submittal also outlines the information that will be solicited in growers' MPIRs. However, Order section VII.F. requires that growers use a MPIR form tailored to the requirements contained in each SQMP,

designed by the California Rice Commission, and approved by the Executive Officer. The California Rice Commission must provide the MPIR form that will be used to the Regional Board for Executive Officer approval.

Staff Recommendation

Based on the staff review, all the required elements of a surface water quality management plan required by the Order are present in the Pyrethroid SQMP. Staff recommends approval of the management plan. In addition, the MPIR form that will be used to support this management plan must be submitted for Executive Officer approval prior to use.