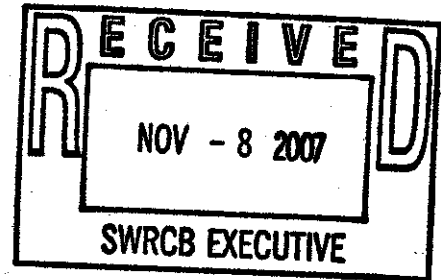




VIA ELECTRONIC MAIL: [cbeegan@waterboards.ca.gov](mailto:cbeegan@waterboards.ca.gov)

November 13, 2007

Mr. Chris Beegan  
State Water Resources Control Board (SWRCB)  
Division of Water Quality  
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 Mr. Beegan:

On behalf of CropLife America (CLA), 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. CLA is a non-profit trade organization representing the nation's developers, manufacturers, formulators and distributors of plant science solutions for agriculture and pest management in the U.S. Our member companies produce, sell and distribute virtually all the crop protection technology products used by American farmers.

CLA wishes to congratulate the SWRCB for taking the scientifically sound Multiple Lines of Evidence (MLOE) approach for assessing potential sediment impairment, which considers sediment chemistry and toxicity, as well as benthic community health to develop sediment quality objectives (SQOs). Successful implementation of the MLOE approach will require consistency across the various regions of California in testing and sampling procedures and in data analysis and interpretation. Therefore, CLA encourages the SWRCB to provide guidance and oversight to the Regional Boards on SQOs, and to seek advice from EPA Region 9 and perhaps even a panel of scientific experts on this issue.

Utilizing a consistent, robust, scientifically-valid approach, along with input from experts, should facilitate an efficient and logical decision-making process that will protect the quality of California's sediments without imposing an unnecessary economic burden on the regulated community.

Sincerely,

A handwritten signature in black ink, appearing to read "Dee Ann Staats".

Dee Ann Staats, Ph.D.  
Environmental Science Policy Leader

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