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Pesticide Action Network
NORTH AMERICA

September 23, 1999

Mr. Lester Snow
CALFED Bay Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

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Dear Mr. Snow,

I am writing to comment on the CALFED plan for reduction of pesticide runoff into surface waters. Although we do not know every detail of the ecological damage caused by pesticides in surface waters, there is irrefutable evidence that aquatic life is suffering serious harm from these chemicals. I have done an extensive review of the literature on this topic, the results of which are included in the enclosed report, *Disrupting the Balance: Ecological Impacts of Pesticides in California.* I encourage you to read Chapter 3, Effects of Pesticides on Aquatic Plants and Animals, where the specifics are discussed. I have two major concerns with the CALFED plan as written.

There are few actions detailed in the plan that would actually reduce discharges of pesticides to surface waters. In particular, there is a glaring omission from the proposed strategies for dealing with pesticide runoff. Most of the attention is given to keeping pesticides on the farms where they are applied, when *reducing total pesticide use* is the strategy that is guaranteed to be successful in decreasing runoff to surface waters—reducing pesticide use should be the primary goal. For this to be a successful approach, support and incentives must be provided to growers to switch from their chemical dependency to more sustainable methods of farming. As many California farmers already know, least-toxic pest management does work. The CALFED plan should pay more than lip service to sustainable agriculture practices, giving these approaches priority for funding and action. Reducing chemical inputs should be the central "best management practice."

Past experience has shown that relying on voluntary action of growers will result in no change to management practices. Change will only take place if pesticide runoff into surface waters is regulated and violators of the regulations are fined. The Rice Herbicide Program that was set up by the Department of Pesticide Regulation in 1984 is a reasonably successful example of how regulatory action resulted in a dramatic decrease in agricultural pesticide runoff into surface waters (see page 61 in the attached report). Voluntary action from growers was requested first, to no avail. It is time to learn from past experience. Regulatory action will be necessary to change grower habits.

Sincerely yours,

Susan E. Kegley, Ph.D.
Staff Scientist/Program Coordinator

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