

that protects water quality and the beneficial uses of water; while providing effective, environmentally sound pest management.

- Identify the roles and responsibilities of our agencies in an effort to protect water quality related to the use of pesticides.
- Eliminate duplication of effort and inconsistency in action.

The Plan is based on our goal to achieve the highest possible degree of water quality protection. We recognize both the importance of water quality in the State and the role pesticides play in maintaining a strong economy and protecting public health and safety. The Plan contains provisions for outreach programs, voluntary and regulatory compliance, interagency communication, and dispute and conflict resolution.

The Plan establishes a four-stage approach to minimize the potential for pesticide movement to ground and surface water. These four stages include:

1. Promote prevention of pesticide contamination of ground and surface water through education and outreach efforts.
2. Establish voluntary reduced-risk practices to mitigate known contamination problems.
3. Mitigate contamination problems through the application of DPR regulatory authorities.
4. Mitigate contamination problems through the application of State and Regional Board water quality control planning programs or other regulatory activity designed to mitigate contamination problems.

The four stages need not be followed sequentially. At any time, DPR or the State or Regional Boards may take action through their respective water quality control programs, or other appropriate regulatory measures, to assure protection of beneficial uses.

DPR and the State Board agreed to regularly update both the MAA and the Plan, assuring maximum protection of the State's water resources.

The major sections of the Plan are summarized below, beginning with Section III (Sections I and II are the Overview and Introduction sections).

III. Outreach

The Outreach section of the Plan represents the first stage of the four-stage approach to prevent problems associated with pesticide movement to ground and surface waters. This section proposes the establishment of education and training programs designed to emphasize the benefits of reduced-risk methods of pesticide application. Ideally, pest control advisers, pest control businesses, growers, farm managers, homeowners, and other pesticide users in both agricultural and nonagricultural situations will benefit from these programs.

IV. State and Regional Boards' Water Quality Protection Programs

This section of the Plan identifies and describes State and Regional Board programs designed to protect water quality. Background information describing the history of specific regulatory authorities is provided in brief. Basically, the State Board and the nine Regional Boards bear the principal water quality regulatory responsibility in the State; the Regional Boards formulate and adopt Regional Water Quality Control Plans (Basin Plans), and the State Board adopts Statewide Plans for surface waters that overlap Regional Board Boundaries, or are Statewide in scope.

V. Ground Water Protection Program

Section V of the Plan describes DPR's Ground Water Protection Program. This program includes implementation of the Pesticide Contamination Prevention Act, a wellhead protection program, and the monitoring of ground water.

VI. Surface Water Protection Program

Section VI describes existing programs and approaches within the State that protect surface water from pesticide contamination. Public education, the pesticide evaluation and registration process, surveillance monitoring, data validity evaluation, response to pesticide finds, and mitigation actions are the topics of this section of the Plan.

VII. Interagency Communication Procedures

This section of the Plan outlines possible avenues for interagency communications aimed at protecting water quality. Communications will include, but not be limited to, interagency meetings to discuss existing and proposed projects and technical issues that deal with pesticides and water quality, and the sharing of study protocols or workplans for monitoring projects. The Plan also establishes the role of the MAA Coordinators as individuals who will oversee the exchange of information among DPR, the county agricultural commissioners, and the State and Regional Boards.

VIII. Dispute and Conflict Resolution Procedures

This section of the report describes both informal and formal procedures for resolving interagency conflicts.

A copy of the Plan will be soon be distributed to the interested public. If individuals have any local issues of concern, they will be referred to their local agricultural commissioner.

COMMENT II. - WPTK

WPTK
The Rice Pesticide Program, was initiated by the California Department of Pesticide Regulation in 1984 to address concerns about rice herbicides in surface water. However, other rice pesticides were included in the program after 1984. Carbofuran is a rice pesticide and is among the parameters of concern. The Program included establishment of rice pesticide performance goals for surface waters. Holding times for rice irrigation water after pesticide application are specified, and the rice industry installed a variety of innovative irrigation return flow control systems. Resulting reductions in rice pesticide concentrations were dramatic, and generally in compliance with increasingly stringent performance goals. The program, context, and results are described in the Supplemental Information section.

The information on the program was not in the Supplemental Information section so I could not comment on the information.

If you have any questions, please contact me at 324-4024.