

To: Elaine Archibald
From: Kati Buehler
Date: October 22, 1997

As promised during Monday's Ag/Urban Water Quality Technical Team's conference call, I did review CALFED's draft Water Quality Component Report. I was pleased to see that many of our group's earlier comments regarding the section on "Action Strategies" are reflected in the report.

I only have two comments, and they both pertain to Section 6, Existing Programs:

1. Pages 6-5, 6-6. The reference to the "Rice Herbicide Program" should be changed to reflect the correct name for that program -- the Rice Pesticide Program. The program was implemented by the Department of Pesticide Regulation in 1983 to control discharges of two rice herbicides, molinate and thiobencarb. In 1990, the program was expanded to include three rice insecticides, carbofuran, methyl parathion, and malathion. In 1991, the plan established performance goals for all five pesticides, under amendments to the Central Valley Regional Water Quality Control Board's Basin Plan. Regional Board staff are currently in the process of amending the pesticide section of the Basin Plan to include defining numeric water quality objectives for the rice pesticides addressed in this program.

(Source: "1996 Report on the Rice Pesticide Program," C DPR, 1-24-97)

2. Page 6-5. The list of existing programs should include reference to the "Dormant Spray Management Practices" program, which is currently being developed by the Department of Pesticide Regulation and the dormant spray registrants. Good contacts for further information about this program would be Marshall Lee of DPR or Steve Murrill, Murrill & Assoc. Enclosed is a copy of the BMPs developed by this group.

✓ Thanks for the opportunity to offer comments.

cc: Rick Woodard