

Water Comm of Cal Fed 10-3100009140 APR 10 97 10:20 AM 002 P.02

S. D. Murrill & Co.

April 9, 1997

Mr. Rick Woodard
CalFed Bay-Delta Program
1416 9th Street
Room 1148
Sacramento, CA 95814

- Axns
- Project Selection

Dear Mr. Woodard,

The following comments pertain to the draft document "Priority Water Quality Subject Areas and Recommended Selection Criteria for Early Project Proposals for Ecosystem Restoration", dated March 31, 1997. These comments are submitted on behalf of myself and the members of the Water Quality Task Force of the Western Crop Protection Association.

Under the heading: Priority Water Quality Subject Areas

Item 2 reads: Reduction of the pesticides Chlorpyrifos, Carbofuran and Diazinon in the Sacramento and San Joaquin Rivers and Delta from surface agricultural drainage and Delta Island drainage.

As I stated in my presentation to the Water Quality Technical Group on April 1, we believe it is potentially counterproductive for a policy such as this to focus on specific chemicals. It's like focusing on the symptom and missing the problem. Chlorpyrifos, carbofuran and diazinon are not the problem. The problem is not any specific chemical, it's an agronomic and chemical management problem. The Rice Pesticide Management Program, as run by the Department of Pesticide Regulation in close cooperation with the rice industry, demonstrates how wise and careful management of pesticides and cultural practices can have a substantial positive effect on water quality. This program has managed to reduce the chemical loading in the Sacramento River from rice pesticide use by over 98%. Axns

Keep in mind, too, that banning or restricting the use of a particular chemical may have unintended consequences. For example, restricting dormant spray use of chlorpyrifos and diazinon may reduce water quality problems but it will cause an increase in use of pesticides during the growing season. One dormant spray application would probably be replaced by two or three in-season cover sprays. Because of the timing, it could potentially increase pesticide exposure to field workers compared to a dormant spray.

We believe that a generic approach would be more appropriate for setting your priority objectives. Additionally, a generic approach would fit better with the concept of keeping the Delta ecosystem healthy by dealing with the root problem not the symptom.

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We suggest the following language to replace Item 2:

Reduction of the impacts of pesticides in the Sacramento and San Joaquin Rivers from surface agricultural drainage and Delta island drainage. ✓

Item 3 reads: Reduction of Diazinon and Chlorpyrifos, nutrients, salinity, dissolved oxygen, turbidity and metals in urban storm water runoff.

For the same reasons mentioned under Item 2, we suggest the following language to replace your Item 3:

Reduction of the impacts of pesticides, nutrients, salinity, dissolved oxygen, turbidity and metals in urban storm water runoff. ✓

Under the heading: **Recommended Project Selection Criteria** - Project Selection

You have suggested that proposals cannot be for:

- Implementing projects for which other funding sources are available.

This is commendable in that it makes an effort to avoid wasting CalFed money. However, you should consider the possibility that money that is available elsewhere may not be granted to the project at issue. If the project is worthy of funding according to the purposes of CalFed, it should be given serious consideration. Rather than disqualification, maybe the policy should promote a negotiation with the other funding source to develop a partnership or cost sharing approach.

We suggest you first consider projects on their merit. Then, if other funds are known to be available, CalFed should work with the project sponsors and other funding sources to develop a partnership or cost sharing relationship.

We appreciate having the opportunity to present these comments. If you have any questions or would like to discuss this further, please don't hesitate to call me.

Sincerely,
S. D. Merrill & Co.

Stephen D. Merrill
Principal

cc: Jim Gray, Western Crop Protection Association
Dr. John Jachetta, Chair, WCPA Water Quality Task Force

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