

Smith, Megan

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**From:** Dana Perls [dana@pesticidewatch.org]  
**Sent:** Thursday, 23 September 2010 16:32  
**To:** ILRP Comments  
**Cc:** Paul Towers  
**Subject:** Comments from Pesticide Watch  
**Attachments:** Pesticide Watch response to ILRP.pdf; ATT00001.htm

Dear Ms. Smith,

In response to the Modesto public information hearing on Sept 9, I am formally submitting my comments about the Draft EIR for the Irrigated Lands Regulatory Program for ICF's incorporation. I am writing on behalf of Pesticide Watch Education Fund, a state-wide non-profit which advocates on behalf of pesticide reform, and responsible governmental regulations for pesticide use.

We applaud the Regional Water Quality Control Board's focus on groundwater contamination. However, we believe this program needs to be stronger with its pesticide monitoring and reduction plans, and are concerned that this program, as it stands, is not strong enough to reduce pesticide pollution of the San Joaquin Valley's water resources.

**This new program must ensure that the basic information on fertilizer and pesticide application on farms is shared by the Department of Pesticide Regulation (DPR).** This information is necessary to establish a baseline to evaluate how much pesticide contamination there is and how to measure improvements in water quality and reductions in application. It will also help evaluate which farms are complying. However, there may currently not be an efficient mode of communication whereby this information will be shared.

**The areas of the Valley which are already at high risk of groundwater contamination should have farm management plans which address how they will avoid exacerbating the pollution problem.** This means farmers should receive assistance from groups such as UC Cooperative Extension to assess what type of treatment their farm actually needs, and how to use integrated pest management practices appropriate for their particular crop.

**The program needs to have much stronger enforcement plans.** We need to ensure there are concrete enforcement mechanisms which will help with stronger results.

**Lastly, the proposed timeline for groundwater quality improvement is too long.** People who are drinking contaminated groundwater cannot wait another ten years to see improvements.

This program EIR needs to work from the knowledge that already thousands of people in the Central Valley cannot use their local groundwater because of contamination from agriculture. The EIR needs to highlight this to ensure there are safeguards in place for farmers to be responsible for preventing further contamination, especially in areas where water is still safe.

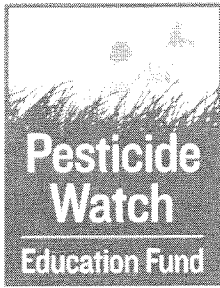
Thank you for incorporating these suggestions into the Draft EIR. If you have any specific questions, please contact me at [dana@pesticidewatch.org](mailto:dana@pesticidewatch.org) or 925-705-1074.

Sincerely,

Dana Perls, MCP, Community Organizer

cc: Paul Towers, Pesticide Watch

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Ms. Megan Smith  
630 K Street, Suite 400  
Sacramento, CA 95814

September 22, 2010

Dear Ms. Smith,

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