

# SACRAMENTO RIVER SOURCE WATER PROTECTION PROGRAM

November 9, 2023  
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California Department of Pesticide Regulation  
P.O. Box 4015  
Sacramento, CA 95812

Submitted via DPR Public Comment Portal: <https://cdpr.commentinput.com/?id=693bMd8pu>

**Subject: DPR's Draft Strategic Plan 2024-2028**

To Whom It May Concern:

On behalf of the Sacramento River Source Water Protection Program (SRSWPP), thank you for the opportunity to review and comment on DPR's draft Strategic Plan. The City of Sacramento, City of West Sacramento, and Sacramento County Water Agency sponsor the SRSWPP; this program is coordinated with other agencies that draw drinking water from the Sacramento River, including the East Bay Municipal Utility District (EBMUD), and the Woodland-Davis Clean Water Agency.

The SRSWPP seeks to maintain the high quality of the Sacramento River drinking water supply. It is our responsibility as water utilities to ensure that the water we deliver to over 2 million customers is both healthful and aesthetically pleasing. Because our water supply intakes are downstream of an important agricultural region, our source water protection efforts include tracking both CA DPR and US EPA regulatory notices regarding pesticides used in that region and coordinating with growers and pesticide regulators on actions to facilitate protection of surface water.

SRSWPP supports DPR's ongoing efforts to improve its human health risk assessment, environmental monitoring, and pesticide regulatory processes in ways that serve to reduce the potential risks to human health from upstream pesticide uses via the drinking water source pathway. The draft Strategic Plan contains a number of elements that can be expected to further strengthen these important efforts to protect human health.

Overall, we support the continuing development from the prior (2018) Strategic Plan in DPR's movement towards sustainability – starting with the draft Strategic Plan's revised statements of DPR's vision and mission – following the earlier (January 2023) release of the Sustainable Pesticide Management (SPM) Roadmap.

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Specifically, we support the following elements of the draft Strategic Plan:

Goal 1.1: Develop partnerships and collaborations for implementing sustainable pest management

We see this as an important means by which DPR can implement its core values of accountability and collaboration. To that end, we encourage DPR to include representation of drinking water agencies within the planned SPM advisory group.

Goal 1.2: Improve timeliness and transparency of science-based evaluation and registration of pesticide products

We appreciate DPR's recent efforts and initiatives in this area, particularly regarding the goal to upgrade the process for pesticide registration environmental review.

Goal 1.3: Develop and implement a prioritization process for reviewing, identifying and evaluating high-risk pesticides, and alternatives and mitigating measures for those high-risk pesticides

We request that specific consideration of potential human health impacts via the drinking water exposure route be included in the development and implementation of the prioritization process, and again request that drinking water agency representation be included in the planned SPM advisory group.

Goal 2.1: Enhance and modernize DPR's collection of information and data to improve program policies, procedures, and priorities

We appreciate DPR's initiatives in this area, and request inclusion of monitoring parameters related to potential drinking water concerns in relation to the goal to establish ongoing ecosystem monitoring. This would include TOC and DOC in addition to pesticides of potential human health concern in drinking water source waters.

Goal 3.2: Improve information access and data sharing

We support the specific goals listed under this topic, as these steps will all contribute to the Department's accountability, collaboration, and transparency.

Again, thank you for the opportunity to review and comment on DPR's draft Strategic Plan. If you have any questions on the preceding comments, please do not hesitate to contact me at (916) 808-1449.

Sincerely,

*Karen M. Newton*

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