

Sacramento River Source Water Protection Program

May 7, 2025
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Ms. Jennifer Teerlink, Deputy Director
Department of Pesticide Regulation
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Sacramento, California 95812-4015

Submitted via DPR's online comment portal at: <https://cdpr.commentinput.com/?id=c6HgahZY7>
And via email

Subject: Pesticide Prioritization Process Presentation, April 8, 2025

Dear Ms. Teerlink:

On behalf of the Sacramento River Source Water Protection Program (SRSWPP), thank you for the opportunity to review and comment on DPR's proposed Pesticide Prioritization Process, as presented in DPR's workshop held on April 8, 2025. 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 healthy and aesthetically pleasing. Because our water supply intakes are downstream of an important agricultural region, our source water protection efforts include tracking both CA Department of Pesticide Regulation (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.

The SRSWPP supports DPR in its ongoing commitment to transparency and stakeholder involvement while fulfilling its mission to "protect human health and the environment by fostering sustainable pest management and regulating pesticides". The proposed pesticide prioritization process is integral to DPR's implementation of sustainable pest management (SPM) and DPR's 2024-2028 Strategic Plan, which includes specific actions to advance SPM.

Assembly Bill (AB) 2113, which provides long term funding for DPR to implement its SPM Roadmap, includes specific requirements for DPR related to pesticide reevaluations, assessing adverse effects of pesticides, and identifying mitigation measures – all of which will benefit from a rigorous prioritization scheme.

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Generation of Potential Priorities

We appreciate that potential pesticide priorities will be developed not just by DPR, but also with contributions by the Scientific Advisory Committee (SAC) and the public.

When identifying potential priority pesticides and then evaluating those “potential priorities”, it is our hope that potential harm to public health via the drinking water exposure route will be given a level of attention commensurate with the attendant risks.

As discussed during the presentation, DPR staff are engaged in developing "Staff-Generated Potential Priorities; Active Ingredient Ranked Lists - Human Health" [Presentation, Slide #13], which DPR expects to be available prior to the convening of the SAC. We are very interested in reviewing both the human health ranked list and the process by which that list was developed. We again urge DPR to include consideration of drinking water exposure in the development of those human health-related potential priorities.

Composition of Scientific Advisory Committee (SAC)

The SAC is proposed to include not more than 15 members, representing a range of disciplines, mostly related to pest control, including IPM. DPR lists 11 disciplines [Slide #20], including "Public Drinking Water or Wastewater Utilities" as important areas of expertise for the SAC. We recommend separating drinking water and wastewater to specifically and separately include public drinking water expertise, in accordance with the preceding comment.

We also recommend adding stormwater *quality* expertise to the list of essential technical areas for the SAC, specifically for someone with expertise directly related to pesticides and stormwater quality. This is important as both environmental and human health pesticide impacts are often derived via rainfall/runoff.

From Potential Priorities to Actual/Identified Priorities

The April 8th presentation described in some detail how potential pesticide priorities would be developed. We reiterate here the question posed (remotely) during the workshop Q&A by our consultant regarding the need for some clarity as to how DPR intends to proceed from the list of “potential priorities” to a list of identified or actual “priorities” – as that is unclear from the presentation – and whether DPR will publish and maintain that list as it evolves and how it will be implemented.

Please clarify whether the end goal of the prioritization process is to annually identify the pesticide(s) that will be selected to enter re-evaluation by DPR, as required by AB 2113, as indicated in the presentation:

“By 2025, initiate reevaluation for at least one pesticide each year (two re-evaluations per year by 2029)”. [Presentation, Slide #5]

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Meanwhile, the presentation makes clear that active ingredients identified as potential priorities will each individually receive attention from the SAC and DPR and may be subject to various actions by DPR.

The flow chart shown on presentation Slide #7 (and repeated on Slides #12 and #16) indicates that potential priorities will be evaluated by the SAC and then referred to DPR for development of action plans. The flow chart shown on presentation Slide #17 depicts in greater detail actions that can be taken by DPR in relation to each of the eight potential priorities that are expected to be generated annually (up to four by DPR, two by the SAC, two by the public).

What is not shown in any of these figures is an off-ramp or decision point indicating whether “potential priorities” will be identified as actual “priorities”, and what steps will follow such an identification for those active ingredients and how it will be implemented.

Similarly, it is not clear how those up to two “potential priorities” from the public will be selected from among potentially many more submitted by members of the public each year.

The SWPP requests clarification regarding the specifics with respect to this process.

Again, thank you for the opportunity to review and comment on DPR’s Pesticide Prioritization Process Presentation. If you have any questions, please contact me at (916) 808-1449.

Sincerely,

Karen M. Newton

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Senior Engineer

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