WPHA
Western Plant Health Association

May 30, 2014

CalEnviroScreen
c/o John Faust, Chief, Community Assessment & Research Section
Office of Environmental Health Hazard Assessment
1515 Clay Street, Suite 1600
Oakland, CA 94612

RE: CalEnviroScreen 2.0

Dear Dr. Faust:

The Western Plant Health Association (WPHA) appreciates this opportunity to comment on CalEnviroScreen 2.0. WPHA represents the interests of crop protection and fertilizer manufacturers, agricultural biotechnology providers, and agricultural retailers and distributors in California, Arizona, and Hawaii. Our members comprise more than ninety percent of all the companies marketing crop production and fertilizer products in these states.

WPHA supports the comprehensive comments submitted by the California Chamber of Commerce on behalf of a coalition of groups concerned with the recently released version of CalEnviroScreen 2.0, *"Re: Comments April 2014 Cal/EPA California Communities Environmental Health Screening Tool Version 2.0 (CalEnviroScreen)."* Additionally, we have concerns specific to our membership that we would like to address.

Drinking Water Quality

This newly added section should be revised to remove misleading inferences and statements. Supporting statements included in the rationale indicate that much of California relies on groundwater for its drinking water and that nitrates can cause drinking water well contamination in agricultural areas. Examples of consequences resulting from elevated levels of nitrate and perchlorate, which can often be attributed to non-agricultural sources, are provided.

While much of California's drinking water does come from groundwater, it is treated through a public water system before consumption. The State Water Resources Control Board's January 2013 report to the Legislature titled, "Communities That Rely on a Contaminated Groundwater Source for Drinking Water," confirms that:

"…according to CDPH, over 98% of Californians on public water supply are served safe drinking water. Although many water suppliers draw from contaminated groundwater sources, most suppliers are able to treat the water or blend it with cleaner supplies before serving it to the public."

While we support CalEPA's efforts to ensure all Californians have clean drinking water, we feel these inferences are misleading and should be removed. The purpose of CalEnviroScrren is to, "…assist [CalEPA] in carrying out its environmental justice mission to conduct its activities in a manner that ensures the fair treatment of all Californians, including minority and low-income populations." It is irresponsible to infer that because some sources of drinking water may be impacted, much of California's population is therefore, drinking contaminated water and being treated unfairly.

Additionally, the inference to cancer resulting from low-level pesticide contamination in drinking water is also misleading. Based on the information provided, the conclusion is based on a single study in which the authors (Colli & Kolettis, 2010) *hypothesized* that bladder cancer mortality risks *may* increase from drinking water contaminated with low levels of pesticides. As presented, reference to this study can only be meant to invoke an emotional response since it holds little if any scientific validity. Further, it infers certain populations are at risk of developing bladder cancer because their water may be contaminated with low levels of pesticides. This study by itself does not support the inference and we request that it be removed.

Pesticide Use

Despite previous concerns raised by other agencies and stakeholders since the development of CalEnviroScreen, the pesticide use section remains misleading and beset with misinformation. Of particular significance are the scale and increments used for the indicator map. We remain opposed to how pesticide use is presented on the map because the increments are not consistent and it is unclear what rationale they are based on. Modifications made to the 2.0 version appear to only exacerbate the problem.

The first 6 increments of the scale, *combined*, represent pesticide use of 11.1pounds or less. Each color coded increment represents a range of pesticide use equal to or less than approximately 7.5 pounds. The last four increments however, represent a range of pesticide use between 11.2 pounds to over 901.7 pounds with incremental ranges from 28 pounds to over 700 pounds. Consequently all areas of the indicator map that represent pesticide use over 11.2 pounds visually appear to be areas of concern.

Contrary to statements made in the document, high use does not indicate a higher likelihood of exposure. We encourage CalEPA to work with the California Department of Pesticide Regulation to redraft the pesticide use section to ensure it accurately reflects potential areas for assessment.

Thank you for consideration of our comments. If you have any questions, please feel free to contact me at (916) 574-944, or Rachelk@healthyplants.org.

Sincerely,

Rachel Kubiak
Director of Environmental and Regulatory Affairs