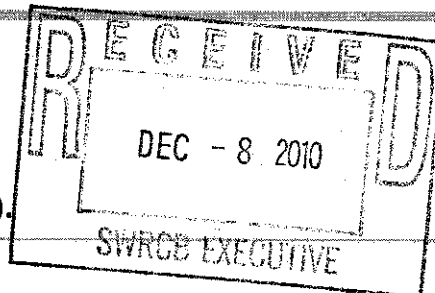


commentletters - Strictly limit and regulate to application date(s).

From: Ronald ward <wardronaldp@hotmail.com>
To: <commentletters@waterboards.ca.gov>
Date: Wednesday, December 08, 2010 4:34 PM
Subject: Strictly limit and regulate to application date(s).



Dear California Water Board,

Please observe an ongoing limitation and regulation of the application of pesticides, fertilizers, and herbicides near any watersheds and/or water sources throughout our state. Beginning with defoliants or pesticides I know as a fisheries biologist type and with references to studies, garlon 4, roundup, and others kill foliage which then can wind up in watercourses. Macroinvertebrate genera such as Hypoglossoma, Limnephilidae, Leptoceridae, and others may not only lose leaf fall that is edible, but also have secondary ingestion or contact to these chemicals causing declines in populations, health condition, or bioaccumulation of these poisons. These organisms are then subject to predation of fish species that also accumulate the toxins. The food web is disrupted and bioaccumulation of toxic materials is initialized. Loss of available plant matter (leaves) are an important cornerstone of some macroinvertebrates food demands and populations are known to be higher as leaf litter increases. These populations of organisms have generally short, but highly productive generation times when food supplies are not limited.

Other chemicals include larvicides/adulticides such as cyfluthrin and imidacloprid, glyphosate, chlorosulfuron, clopyralid, imazapyr, triclopyr, and butoxyethyl ester, triclopyr triethylamine, acetamiprid, bifenthrin, carbaryl, esfenalerate, lambda cyhalothrin, malathion, and pyrethrins. Larvicides such as BTK and NPV and spinosa A&D should also demand special consideration and as refined and direct applications as possible. These chemicals are not natural in the environment and should be severely limited when applied. Toxins tend to be at least temporarily persistent and known to enter secondary food chains, waterways, and can affect macroinvertebrates and other living organisms including humans. Water quality is affected and can be altered in various ways due to accumulation of poisons. These chemicals can have a wide assortment of effects and lead to toxic cancers and other unhealthy problems. These are serious chemicals and their use should be strictly regulated and the schedule of application dates should be posted publicly. Implicit in their suffix is the -ide or death to pests. We deserve our water quality to remain pure and vital to produce healthy and vibrant water quality.

I am thankful for the opportunity to provide critical review and comments to voice these concerns and hopefully inspire the curtailment of any laxing of the rules, application techniques, concentrations, and/or amounts of these chemical entering our public or private lands or watersources. California may have more opportunities in organic farming or harvest (farmed crops, rotational) due to the diversity of the potentials of a diverse and mix of farmed species, including biodynamic methods, that utilize native and non-native plant species, permacultural techniques, and other means due to our unique climate that is very hospitable to seasonally varied crops and farming habits. Our climate is generous to our farmers throughout the year and many plants or crops fall within various zones fruitful to various species across the globe.

Sincerely,

Ron P Ward