1107 9TH Street, Ste 601
Sacramento, CA 95814

Ph: 916.551.1883
Fx: 916.448.4560

info@pesticidewatch.org
www.pesticidewatch.org

Hexazinone Comments
Attention: Ann Hanger, Staff Environmental Scientist
California Department of Pesticide Regulation
Pesticide Registration Branch
1001 I Street, P.O. Box 4015
Sacramento, CA 95812
phone: 916-324-3535
email: ahanger@cdpr.ca.gov

May 24, 2011

RE: Additional Comments Pertaining to Hexazinone Detections in Ground Water

To Whom It May Concern:

On behalf of Pesticide Watch Education Fund, Community Water Center, El Comite para Bien-Estar de Earlimart, and El Quinto Sol, we urge you to move forward with cancelling the registration of Hexazinone pursuant to Section 13151 of the California Food and Agricultural Code. The preponderance of evidence suggests that this chemical has polluted and will continue to pollute the groundwaters of the state, and that merely placing addition restrictions on its continued use will not protect public health. Pursuant to Section 13150(c) of the California Food and Agricultural Code, the subcommittee of the Director's pesticide registration and evaluation committee should make this finding and issue a recommendation to the Director to cancel the registration of Hexazinone.

Even in low concentrations, Hexazinone poses threats. Numerous studies have demonstrated that Hexazinone is highly likely to contaminate groundwater. As a groundwater contaminant, Hexazinone's registration must be canceled to prevent it from entering into groundwater supplies, even in low concentrations, and thereby irreversibly contaminating California's limited groundwater supply.

Hexazinone contamination puts the health of Central Valley communities at risk and is a clear environmental justice threat. Groundwater contaminated with Hexazinone is dangerous and threatens the health of people and the environment. Over 110,000 pounds of Hexazinone products have been applied, largely in California's San Joaquin and Sacramento Valleys. The San Joaquin Valley bears the greatest burden of Hexazinone usage, especially for alfalfa crops. In 2009, 361,931 pounds of pesticides were applied to alfalfa crops in Fresno County alone, of which nearly 3,000 pounds were Hexazinone. As over 90% of the San Joaquin Valley depends on groundwater for drinking water supplies, the impacts of this contamination are widespread, affecting municipalities, other public water systems, and private well owners. Furthermore, Latinos, who make up approximately 40% of the Valley's population and have of some of the lowest incomes, bear a disproportionate share of this burden, as many Latinos reside in unincorporated areas that lack expensive drinking water treatment systems and are unable able to drink the water coming from their taps as a result.

The cumulative impacts of Hexazinone combined with other contaminants presents an unknown risk. There are a large number of other environmental contaminants in the Central Valley, in addition to Hexazinone. There have not been sufficient studies on the combination of Hexazinone with other contaminants, even at low concentrations.

Without this information, we do not know the dangerous effect that a mixture of pesticides will have on the health of local residents, most of whom depend on groundwater for their drinking water supply.

Alternatives to Hexazinone do exist. Dozens of other herbicides, some more organic than others, are already in use for alfalfa and other crops. University of California Extension, University of Maine, and other partners can play a leadership role and help farmers transition from the use of Hexazinone to less harmful substances.

In accordance with public health and state law, Hexazinone registration should be cancelled.

Sincerely,

Paul S. Towers
Pesticide Watch Education Fund

Teresa DeAnda
El Comite para El Bien-Estar de Earlimart

Irma Medellin
El Quinto Sol

Laurel Firestone
Attorney at Law and Co-Executive Director
Community Water Center

Rose Francis
Attorney at Law
Community Water Center