

Kathleen Kilpatrick

DPR Strategic Plan Personal Comments

Thank you for the opportunity to comment. I attended the Zoom Oct 19, was taken by surprise by the few attendees, gave a brief off-the-cuff critique. I was also at the live meetings in Watsonville and directed my remarks to the poor timing and publicity of the public meetings. The majority of the people in that room were there due to the efforts of community groups and members, not DPR's outreach. Two letters for groups I work with, CPR, and California Nurses for Environmental Health and Justice, have submitted letters with which I concur.

Just like the state's Climate Action Plan, those of us concerned about our children's and our planet's future believe this plan is much too late, too slow, too incremental. Damage to our residents and environment has already happened, is happening. We encouraged our youth to come out and speak up for themselves and their community, and they did.

DPR's Strategic plan is a fairly vague wish list with implementation dates left blank. What specifics it contains are insulting to residents of ag communities in their lack of impetus for needed changes. There are some openings, for substantive change electronically. Here are some suggestions:

Diversity, Equity, and Inclusion (DEI) are buzzwords among local and state agencies now. The governor included them in a recent edict on agency operation in response to climate change and related disasters, referenced in your plan. When reduction of pesticide harms is the issue, we see this through the lens of Environmental Justice (EJ). Still, it took a bill, AB 652, just passed and signed by the governor to make DPR form an EJ Advisory Committee. The bill's implementation deadline is Jan 2026, a compromise to get it signed, but there's no reason it can't happen sooner. We want to see a concrete plan for committee selection, funding (less than DPR's estimate is likely to be needed.), and scheduling a first meeting ASAP.

Sustainable Pest Management (SPM) is now DPR's latest buzz-word, a kind of Integrated Pest Management Lite at state-wide scale with some social and economic protections folded in. However, the Strategic Plan's description of the process could be easily interpreted as rushing new, replacement chemicals onto the market, while slowly eliminating the worst of the old ones. The SPM Roadmap's target date to get rid of just the most hazardous chemicals is 2050, even farther in the future than the date of 2045 CARB set for full implementation of the state's most recent Climate Action Plan. This is not soon enough for workers and communities already experiencing harm from pesticide exposure. Implementation of the Roadmap requires a major change to our ag systems, not just a change of products and accounting. Sustainability involves economics, is not ruled by it.

Some numbers in this plan: Evaluate at least two toxic chemicals a year, and reduce Priority Pesticides by 5% per year. Hazardous pesticides are already harming workers, residents of ag communities, and especially those most vulnerable: babies in utero, children, the elderly, and those with genetic sensitivity or chronic illness. In spite of emerging science on pesticide harms, DPR doesn't use the word urgency until almost end of the plan. We don't just want mitigation, we want elimination, and not in the distant future

New products may be fast-tracked in the name of SPM. We are wary of the new category of pesticides term biologics. They could be less toxic, but just like past transitions from one class of chemicals to another (DDT to organophosphates like chlorpyrifos, glyphosate and GMO seeds, the rise neonics, etc), long-term and combined impacts on humans and the environment are, as yet, unknown. They need to be tested for safety using the best methods of neutral emerging science, not by those who stand to profit from their sales So do a slew of older pesticides already in use. The plan offers no new ideas as to how to catch up with the enormous backlog, much less how to approve new chemicals with entirely different mechanisms of action.

To implement SPM, DPR must emphasize agro-ecology, biodiversity, and soil health as non-toxic solutions. Our whole way of growing food needs to change, not just the products applied. We need the focus to be on rebuilding biological systems, restoring biodiversity, building healthy soil. Initiatives for these tasks are not directly under DPR's purview, but they are essential to the transformation of our food production. This means in integrated system of management incorporating agro-ecology, land use, labor and sales markets, human health protection. DPR's job is to make sure CACs, PCAs, and county extension offices are recommending the least toxic methods, not just products.

DPR states the intent to collaborate with the County Ag Commissioners (CACs). Yet some of them have refused to meet with concerned community groups. Regulations for worker safety and pesticide use around schools are inconsistently enforced. CAC participation in the state's planned notification project has been spotty, with resistance to including more hazardous chemicals and exact location of applications. DPR and CACs need to have pesticide information available in languages the community speaks and can understand. DPR has repeatedly failed to exert your statutory authority over CACs.

More monitoring, and better data collection and presentation are definitely needed! The data available on a map that's easy to find and make sense of is still from 2018! We have only six or eight monitors for pesticides in the whole state, and most of those were a concession to a 1999 civil rights lawsuit by parents of children in primarily Latino schools. We think EVERY school within a mile of ag fields should have both a bigger buffer and a monitor! Since the Notification Plan and revision of the school regs are up for review soon, I will reserve further comments for those processes.

Agencies need to collaborate much more effectively. The state's Climate Action Scoping Plan was assigned to CARB, pesticides are under DPR, water's in another agency, DPR won't use OEHHA's numbers. CA Dept of Food and Agriculture (CDFA) is separate CalEPA, as are the Natural Resources Agency and the Dept of Health. You all need to work together more efficiently and effectively. Pesticides are in our air, water, soil, food, and our bodies.

The health of ag communities is worth something. DPR might measure the amount of pesticides, do a little monitoring, create mitigation models, but to us it seems like the important numbers are how much food we grow for export and the profits for big ag. These are not full measures of the impacts on our communities! The healthcare providers in our communities and the community educators, the teachers, all need the resources to collect data that will help residents of our communities tell our stories, and compel DPR to act. Please include experts with explicit expertise in human health assessment and communication in your consultation and evaluation processes.

Thank you! Kathleen Kilpatrick, RN-NP, MN, PHN, CSN
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