







WORKSAFE
safety, health, and justice for workers
seguridad, salud y justicia para los trabajadores



Foodwise
Education. Farmers markets. Community.



August 1, 2024

Director Julie Henderson
Department of Pesticide Regulation 1001 I Street
PO Box 4015
Sacramento, CA 95812-4015
Via email: dpr23003@cdpr.ca.gov

Dear Director Henderson:

Thank you for the opportunity to provide public comment on the [revised draft](#) of the statewide pesticide notification regulation. We appreciate the inclusion of a review process to ensure that the notification program is working as intended. We strongly support inclusion of acres treated in the notification, because with larger applications there is more pesticide available to drift. We also strongly support inclusion of the pesticide product names and all active ingredients, because some people are more familiar with commercial names and others know the chemical names.

However, this latest version of the regulation continues to deny Californians the crucial location information that is the cornerstone of an effective public health notification system. Providing only the square mile in which a planned application is located is inadequate and cannot be justified, given that the exact location is known by the County Agricultural Commissioners in advance and can easily be made public.

Farmworker communities, including those involved in the various pilot notification programs, have repeatedly called for exact location information so that they can better protect their families from highly hazardous pesticide drift. The threat of harm is more severe if the application is in the field behind your home or across the street from your child's school, than if it's a mile away or at the distant corner of the Public Land Survey section.¹

DPR has not wavered from its claim that it cannot provide the exact application location in its proposed regulation for a pesticide notification system because this information is not standardized. DPR has the authority to require standardized reporting and has a multi-million dollar notification budget to do so. There is no justification for continuing to withhold this information.

The proposed system will require standardized electronic submission of all Notice of Intent (NOI) information for use in the state's notification system. DPR should standardize exact application location as part of that new requirement.

If DPR continues to refuse to require NOIs to include standardized application location information, at the very least the non-standardized location must be included in the notification system such as the site ID number, the address of the site, or other location description.

Scientific research confirms that within a mile, the threat of exposure to many pesticides tends to increase the closer one lives to pesticide application sites. A recent meta-review² that assessed six studies³ noted: "All [six studies] found that the greater the distance [from the pesticide application], the lower the levels in pesticide concentrations in dust, outdoor and indoor air."⁴

The exact location of pesticide applications is essential information in allowing for individuals and communities to respond appropriately to protect their health from drifting pesticides. DPR has access to that information and must provide it in the pesticide notification system.

Sincerely,



Jane Sellen and Angel Garcia, Co-Directors
Californians for Pesticide Reform

Alicia Acevedo, Creative Director
Acevedo Media LLC

Katie Huffling, Executive Director
Alliance of Nurses for Healthy Environments

Hardy Kern, Director of Government Relations
American Bird Conservancy

Cailin Dendas, Environmental Health Senior Coordinator
As You Sow

Cheryl Auger, President
Ban SUP (Single Use Plastic)

David F. Gassman, Co-Convenor
Bay Area System Change Not Climate Change

Constance Beutel, Member
Benicia Good Neighbor Steering Committee

Sara Grantham, Science, Regulatory, and Advocacy Manager
Beyond Pesticides

Arnedra Jordan, Project Manager
Black Women For Wellness

Jacob Sandoval, State Director
CA League of United Latin American Citizens (LULAC)

Ellen Marks, Director
California Brain Tumor Association

Nan Wishner, Board Member
California Environmental Health Initiative

Thomas Helme, Coordinator
California Environmental Justice Coalition (CEJC)

Clarissa Ramirez, Policy Manager
California Latinas for Reproductive Justice

Vanessa Forsythe, RN MSN
California Nurses for Environmental Health and Justice

Larry Hanson, Board President
California River Watch

Anne Katten, Pesticide and Work Health and Safety Project Director
California Rural Legal Assistance Foundation

Kathleen Kilpatrick, Founding Member
Campaign for Organic and Regenerative Agriculture

Sandra Garcia, President
Campeñas Unidas del Valle de San Joaquin

Teresa Gomez, Community Organizer
CAPS 805

Raul Garcia, Community Organizer
CAPS Tulare County

Jonathan Evans, Environmental Health Legal Director
Center for Biological Diversity

Thomas R. Fox, Senior Legislative Counsel
Center for Environmental Health

Dr. Ann Lopez, Executive Director
Center for Farmworker Families

Dashel Murawski, Policy Coordinator
Center for Food Safety

Grecia Orozco, Staff Attorney
Center on Race, Poverty, & the Environment

Kevin Hamilton, Senior Director of Government Affairs
Central California Asthma Collaborative

Nayamin Martinez, Executive Director
Central California Environmental Justice Network

Catherine Garoupa, Executive Director
Central Valley Air Quality Coalition

Daniel O'Connell, Director
Central Valley Partnership

Sarait Martinez, Executive Director
Centro Binacional para el Desarrollo Indigena Oaxaqueño (CBDIO)

Autumn Johns, Executive Assistant to the CEO & Policy Coordinator
Ceres Community Project

Natalia Deeb-Sossa, Professor
Chicana/o/x Studies at UC Davis

Colleen Corrigan, Health Policy Associate
Children Now

Ken Szutu, Director
Citizen Air Monitoring Network

Felipe Perez, Council member
City of Firebaugh

Andria Ventura, Legislative and Policy Director
Clean Water Action/Clean Water Fund

Renee Donato Nelson, President
Clean Water And Air Matter (CWAM)

Suzanne Hume, Educational Director and Founder
CleanEarth4Kids.org

Bill Magavern, Policy Director
Coalition for Clean Air

Felipe Aguirre, Director
Comite Pro Uno

Dennis Rosatti, Executive Director
Conservation Action Fund for Education

Lindsey Zehel, Executive Director
Defend Them All

Cynthia Babich, Director
Del Amo Action Committee

Dolores Huerta, President
Dolores Huerta Foundation

Dan Silver, Executive Director
Endangered Habitats League

Laura Deehan, State Director
Environment California

Bill Allayaud, California Director of Government Affairs
Environmental Working Group

Yolanda Whyte, MD, President
Ethical And Respectful Treatment of Humans

Lendri Purcell, President
Families Advocating for Chemical and Toxics Safety

Anna Hopkin, Executive Director
Farm2People

Lauren Ornelas, Founder
Food Empowerment Project

Christine Farren, Executive Director
Foodwise

Jim Lindburg, Legislative Consultant
Friends Committee on Legislation of California

Malaika Elias, Food and Agriculture Campaigner
Friends of the Earth

Juan Valladolid, Director
Fundación Valladolid

Victor Torres, Co-Founder Youth Leader
Future Leaders of Change

Michelle Perro, MD, CEO
GMOscience.org

Patti Wood, Executive Director
Grassroots Environmental Education

Arlene Blum, PhD, Executive Director
Green Science Policy Institute

Bradley Angel, Executive Director
Greenaction for Health and Environmental Justice

Lucia Sayre, Western Regional Director of Innovation and Community Resilience
Healthy Food in Health Care, Health Care Without Harm

Jennifer Tanner, Leader
Indivisible CA Green Team

Susan Morgan, Founder
Indivisible Marin

Kimberly Baker, Executive Director
Klamath Forest Alliance

Emma De La Rosa, Regional Policy Manager
Leadership Counsel for Justice and Accountability

Gloria Alonso Cruz, Environmental Justice Advocacy Coordinator
Little Manila Rising

Richard Moore, Co-Coordinator
Los Jardines Institute

Belita Cowan, President
Lymphoma Foundation of America

Sydney Cook, Director of Science & Research
MADE SAFE

Linette Lomeli, Executive Director
Madera Coalition for Community Justice

Leah Segedie, Founder
Mamavation

Terrie Green, Executive Director
Marin City Climate Resilience

Lynn Kersey, Executive Director
Maternal and Child Health Access

Vanessa Terán, Director of Policy
Mixteco/Indígena Community Organizing Project (MICOP)

Zen Honeycutt, Founding Executive Director
Moms Across America

Francisco Rodriguez, Secretary Treasurer
Monterey Bay Central Labor Council, AFL-CIO

Catherine Crockett, President, Board of Directors
Monterey Peace and Justice Center

R. Brent Lyles, Executive Director
Mountain Lion Foundation

Kathleen Mulligan, Executive Director
National Association of Environmental Medicine

Erika Alfaro, San Francisco Bay Area NAHN Chapter President
National Association of Hispanic Nurses

Diana Carpinone, President
Non-Toxic Communities

Kim Konte, Founder
Non-Toxic Neighborhoods

Dave Henson, Executive Director
Occidental Arts and Ecology Center

Margaret Reeves, Senior Scientist
Pesticide Action Network

Martha Dina Argüello, Executive Director
Physicians for Social Responsibility, Los Angeles

Matthew Marsom, Chief Program, Policy & Government Relations Officer
Public Health Institute

Mackenzie Feldman, Project Director
Re:wild Your Campus

Gopal Shanker, President
Récolte Energy

Brandon Kitigawa, Senior Policy Associate
Regional Asthma Management and Prevention

Yanely Martinez, Community Organizer
Safe Ag Safe Schools

Oscar Ramos, Migrant Program Director
Salinas Elementary School District

Robert M. Gould, MD, President
San Francisco Bay Physicians for Social Responsibility

Ted Schettler MD, MPH, Science Director
Science and Environmental Health Network

Martha Camacho Rodriguez, Director
SEE (Social Eco Education)

Kevin Bayuk, Treasurer
SF Permaculture Guild

Membership
Sonoma County Climate Activist Network (SoCoCAN!)

Shoshana Wechsler, Co-Coordinator
Sunflower Alliance

Lupe Cipres, Community Outreach Representative
Terra Bella Voice 4 Change

Ana Parras, Co-Director
Texas Environmental Justice Advocacy Services

Liz Barris, Director
The People's Initiative Foundation

Herman Barahona, Lead Community Organizer
The Sacramento Environmental Justice Coalition

Patricia Pagaling, Executive Director
Transition to Organics

Jassy Grewal, Legislative Director
UFCW Western States Council

Akashdeep Singh, Western States Policy Advocate
Union of Concerned Scientists

Bianca Lopez, Co-Founder
Valley Improvement Projects

Emily Schwing, Acting Executive Director
Veggielution

Janice Schroeder, Core Member
West Berkeley Alliance for Clean Air and Safe Jobs

Dr. Elizabeth Dougherty, Executive Director
Wholly H2O

Randa Solick, Member

Women's International League for Peace and Freedom, Santa Cruz

Stephen Knight, Executive Director

Worksafe

1. The threat of exposure to fumigants, of course, varies more widely at longer distances and times.

2 [Dereumeaux, C., Fillol, C., Quenel, P., and Denys, S. \(2020\)](#). Pesticide exposures for residents living close to agricultural lands: A review. *Environment International*, 134, 105210

3 [Deziel et al., 2017](#), [Gibbs et al., 2017](#), [Gunier et al., 2011](#), [Hogenkamp et al., 2004](#), [Kawahara et al., 2005](#), [Ward et al., 2006](#)

4 “Outdoor air concentrations of trichlorfon within 50 m of paddy fields were five times higher than those measured further away (Kawahara et al., 2005), and high levels of chlorpyrifos in outdoor air were identified at households located within 100 m of crops (Gibbs et al., 2017). Chlorpyrifos, chlorthal-dimethyl, iprodione, phosmet, and simazine dust concentrations were higher in residences located between 500 m and 1250 m from treated lands (Gunier et al., 2011). Similarly, the decrease in concentrations of chlorpropham in house dust was borderline statistically significant with increased distance from agricultural fields (Hogenkamp et al., 2004). The meta-analysis performed in 2017 confirmed the sharp decrease in house dust pesticide concentrations with increased distance from treated fields (between 3 m and 1125 m) (Deziel et al., 2017)”