



Mixteco/Indígena Community Organizing Project

505 South "A" St., Oxnard, CA 93030

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Thursday, August 1st, 2024

Department of Pesticide Regulation (DPR) – Notification

% Director Julie Henderson

1001 I St., P.O. Box 4015

Sacramento, CA 95814

RE: Organizational Public Comment(s) – DPR 23-003 Statewide Notification of Agricultural Use of Restricted Materials (Modified Regulations)

Dear Julie Henderson,

On behalf of the Indigenous and migrant farmworking community, the Mixteco/Indígena Community Organizing Project (MICOP) serves in the California Central Coast; we strongly support the effort to provide Californians with advance notice of hazardous pesticide use¹. We urge you to ensure that the new regulation is as effective as possible to ensure that impacted residents can protect themselves from harm. The system must include the exact location of planned pesticide applications to be truly effective.

MICOP was established in 2001 to support, organize, and empower Ventura County's 20,000 Indigenous immigrants; since then, it has grown to serve Santa Barbara County and San Luis Obispo County. MICOP is a preeminent organization addressing the unique needs of indigenous immigrants living in Ventura County. MICOP serves approximately 7,000 indigenous families in Ventura County annually. The Indigenous farmworkers population and community is overwhelmingly employed in the extremely difficult row crop agricultural sector, indigenous unwritten languages and limited literacy skills present tremendous barriers to access in the health, education, and social services sectors. The Mesoamerican Indigenous community is considered one of the largest agriculture workforces in the state of California.

The UC Merced Farmworker Health Study assessed the health of Californian agricultural workers focused on the long-term health of agricultural workers, the

¹ https://www.cdpr.ca.gov/docs/legbills/rulepkgs/23-003/dpr_23-003_oal_text_modified.pdf



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ability to access high quality health care, and more. In terms of healthcare coverage and healthcare utilization, more than half (51%) of farmworkers did not have health insurance coverage. However, only 43% of farmworkers claimed they had visited a doctor's clinic within the past year. The study found that 62% of Indigenous Farmworkers in California do not have health coverage.

The lack of healthcare coverage, combined with the effects of pesticide exposure and inaccurate information regarding pesticide application, significantly increases the risk to our farmworking community and the general public. Applications near residential areas are particularly concerning and warrant additional precautions compared to those applied at a greater distance.

Eight out of the ten most commonly applied pesticides in Ventura County have significant health impacts on farmworkers. One of the most toxic pesticides, Chloropicrin, classified as a restricted material, was applied to 1,849,170 pounds of Ventura County crops in 2016. Chloropicrin, originally used as a tear gas in WWI, is a potentially fatal fumigant. Its use today poses serious health risks, including neurodegeneration, and can reduce the life expectancy of farmworkers. Additionally, in 2010, 13,000 students in Ventura County attended classes within a quarter mile of areas heavily treated with potentially harmful pesticides², more than in any other county in the state.

To further evidence the need for the exact location of pesticide applications, we present written testimony from 13 Indigenous leaders from MICOP's Policy and Advocacy Department and Indigenous Health Committee, many of whom are farmworkers or former farmworkers still living and working in the fields of California. Their stories underscore the damaging effects of pesticides and the necessity for the DPR to provide precise locations of pesticide applications to ensure the safety, protection, and well-being of the community that sustains California's agriculture.

We respectfully request that the California Department of Pesticide Regulation (DPR) consider these public comments on the revised draft rule that will provide advance public notice of applications of the most hazardous pesticides and **require the exact location of a pesticide application to be identified**, rather than only providing



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identification within a square mile. People deserve the right to know what is being used near their homes, schools, and places of work.

If you have any questions, please contact me or our Executive Director, Arcenio J. Lopez at arcenio.lopez@mixteco.org.

Sincerely,

Vanessa Terán

Director of Policy

Mixteco/Indígena Community Organizing Project (MICOP)