

Kali Krishnan

Dear Director Julie Henderson,

Dear Director,

I am writing to you today to ask you to strengthen the draft regulation for a statewide pesticide notification system to include the exact location of planned pesticide applications, and a process for ensuring that the regulation will be revised in response to community feedback.

For many years now, residents of farmworking communities have been calling for advance warning of pesticide use near their homes and schools. The draft regulation represents a significant and welcome step toward transparency regarding chemical use by the agricultural industry.

However, a series of pilot notification projects in 2022 confirmed that, without exact location of planned applications, it is difficult to take steps to prevent exposure to pesticides. Your Department received extensive feedback from the pilots calling for detailed location information, but has refused to standardize the location information so that it can be provided to the public.

This regulatory process is the perfect opportunity to standardize this information. It's impossible to justify designing a public health notification system that deliberately fails to disclose known location information. I ask you to revise the regulation to include the exact location of all pesticide applications included in the system.

Furthermore, DPR has repeatedly stated that the regulation represents a first step toward a robust notification system, and that the regulation will include a process for community feedback and improvement. However, the current draft includes only a report on the regulation by DPR staff after three years.

I ask you to honor your commitment to establishing a truly iterative process for the regulation, by establishing an annual community advisory panel and including a commitment to make needed changes to the regulation based on the panel's feedback.

Thank you for taking this step toward transparency in agriculture.

Sincerely,

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Kali Krishnan