

# Safe Ag Safe Schools – Monterey Bay

Dear Director Henderson,

Safe Ag Safe Schools – Monterey Bay would like to add to our previous comments in earlier rounds of the pesticide notification hearings and to the many individual comments of our members.

We want to see the exact location of the upcoming pesticide application in the pesticide notification system. It's not notification without location.

Your current draft still keeps the most important information about the pesticide application secret from our communities: exactly where these highly hazardous restricted pesticides will be applied.

The closer the application, the larger the threat, the more precautions we need to take for our loved ones. A one-mile square just does not give us enough information, as 500 feet is far different than 5,000 feet, yet DPR's plans do not allow us to know the difference.

We'd like to address some of the complaints or concerns we've heard against including exact application location information in the proposed system.

*No standardized location information? Standardize it.*

DPR has argued that the lack of a standardized way to record location information in NOIs prevents inclusion of location in the notification system. Our members say: Then standardize it! The regulation calls for growers to submit NOIs online; it could also standardize how the location box is filled out. Short of that, DPR could certainly include the current location box information, even if not standardized.

*It violates growers' privacy? No, NOIs are public documents.*

NOIs upon which the pesticide notification system is based are public documents.

Our members pushed for and have eight years of experience with a fumigant notification system for ten schools in Monterey County, based on NOIs that include the exact location as well as maps indicating the farm's name and proximity to the schools. Exact location has been part of notification for eight years. It should continue going forward.

Also, if a neighbor sprayed poison into your yard, they can't claim the right to privacy to do that.

Similarly, we know harmful pesticides drift from farms onto our properties, schools, and workplaces. Pesticide drift is illegal; it's not protected by privacy rights.

*It would create mass confusion? No, exact location addresses current confusion in farmworker communities.*

The confusion is now: we don't know what, when, or where pesticides will be applied. We assume DPR will make clear that the application information is a notice of intent and not a guarantee of pesticide use, of course. One of the main reasons for the need for exact location is to avoid confusion about where the most potential health harm is located. This was a concern of many participants in the Santa Cruz County pilot notification project -- that there were so many notices, they couldn't differentiate between those in the field behind their house versus those a mile away. Fear was heightened without knowing exactly where the application would happen.

*The activists will protest in the fields? No, the activists want to avoid the source of potential harm to their communities.*

Of all the crocodile tears expressed in the media and sometimes even in the hearings, these were the most disingenuous. A number of County Ag Commissioners and Big Ag representatives have pushed the lie that in Monterey County activists went into the fields to stop a fumigation. In the fourteen years of SASS' existence, we have never, nor would we ever put our members in harms way by exposing them to pesticide applications. The whole point is to keep as safe as possible and as far away and protected as possible from these restricted pesticides.

Grower representatives at the Turlock hearing expressed concerns about activists “trespassing” onto their fields, if we knew where pesticides would be applied. The trespass issue is in the reverse direction: highly hazardous pesticides trespass into our homes, schools, and workplaces. There is no good excuse. DPR must include the exact location of the pesticide application in its statewide pesticide notification system.

Sincerely,

Yanely Martinez

Safe Ag Safe Schools (SASS) Organizer