

Mayra Sanchez

Thank you for considering our comments. Please see file attached.



May 1, 2026

Juvenio Guerra
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Re: Public Comment on SprayDays First Annual Report

Dear Juvenio and SprayDays Team,

Thank you for the opportunity to comment on the first annual [SprayDays report](#). We offer the following feedback for your consideration.

I. Notifications must include the exact location of planned applications

The CPR coalition continues to call on DPR to provide the exact location instead of the square mile in which an application is scheduled to occur.

The report acknowledges that public feedback has included the demand for exact location, and includes it as one of the “areas that were addressed during the reporting period or have been identified for improvements,” (p.22). However, provision of exact location has not in fact been addressed during the reporting period, nor is it listed as a planned area of focus in 2026 (p.28).

Exact location remains the top priority of the coalition, and we continue to maintain that a public health notification system should not withhold the timely dissemination of vital and publicly available data.

II. Community members request an app in addition to email and texts

As the report notes, the communities we work with have expressed a strong preference and need for an app as an additional alternative option. We urge DPR to rapidly develop a notification app as an additional notification platform, which is better suited to the needs of many farmworking community members and is more likely to encourage widespread adoption and use.

III. Health information for each active ingredient

Given the limited number of pesticides included in the SprayDays system, we call on DPR to provide health information specific to each active ingredient for which notification is provided.

- a. ***DPR must produce community-friendly factsheets for each of the roughly 50 active ingredients in the SprayDays system.*** Currently DPR provides factsheets for only two fumigants and the breakdown product MITC, and links to NPIC information for six additional active ingredients. As an example of the kind of information that should be provided for each active ingredient, please see [Appendix 1](#), below.
- b. The link to the [MITC factsheet](#) should clearly state that it is a breakdown product of three fumigants, and should identify the fumigants by the names given in the notifications: metam sodium, potassium n-methyldithiocarbamate, and dazomet. It is not reasonable to expect the public, upon receiving notification of applications of these fumigants, to know that the MITC factsheet applies to them.
- c. The [MITC factsheet](#) itself references the active ingredient “metam potassium”. However, the chemical name provided in the notifications is potassium n-methyldithiocarbamate. It is not reasonable to expect the public to know that these are one and the same. Please make it clear that these two names are for the same pesticide.
- d. The [MITC factsheet](#) misidentifies dazomet as a product instead of an active ingredient. Please correct this error.

IV. More information on restricted materials

Users of the SprayDays system have many unanswered questions about restricted material pesticides, and what is and is not included in the SprayDays system. DPR should revise the [FAQs](#) to provide this additional information.

- a. ***Please provide a complete list of the active ingredients included in SprayDays that are currently used in California.*** Although the FAQs pose the question “What are the specific “restricted material” pesticides included in SprayDays?”, the response does not answer the question. The [appendix](#) to the annual report includes a link to a list of California restricted material pesticides in English and Spanish, but this link is not included in the SprayDays FAQs.
 - i. Please reference the total number of active ingredients registered for agricultural use in California, so that visitors to the site can better understand what proportion of pesticide use in the state is, and is not, reported in SprayDays.
- b. ***Please provide background information on restricted pesticides***, including why some hazardous pesticides are restricted while others are not. Although the SprayDays website is clear that the system only applies to California restricted material pesticides, it is vague as to why some hazardous chemicals are restricted material pesticides and others are not.

- i. Please provide a community-friendly explanation as to how restricted material pesticides become designated as such and what differentiates them from other hazardous pesticides.
- ii. Under the [FAQ](#) “What criteria are used in California to designate a pesticide as a restricted material?” it is insufficient to merely cite [the statute](#). For example, in the case of the first statutory criterion “danger of impairment of public health,” why are some pesticides not restricted even though they are known to impair public health, such as most of the organophosphates and [Proposition 65-listed pesticides](#), as well as 6 of the 8 pesticides linked to childhood brain tumors [in a recent study](#)?

V. Improvements to the Map page on the SprayDays Website

Community residents appreciate the ability to review proposed applications on a public-facing map without the need to register or sign in. We would like to propose the following improvements to the map:

1. In addition to Product Name, Active Ingredients, Application Method, Treated Acres and EPA Reg No, please provide the following additions to the application information:
 - a. The restricted material active ingredient should be a clickable link that takes you to a page specifically about that chemical. (See [III. Health information for each active ingredient](#) above).
 - b. Please provide the section information without having to click “Get a location specific QR code.”
 - c. Please include how much of the active ingredient is proposed to be used.
 - d. Please include information about the specific crop involved in a planned application.
 - e. Please provide the site ID and permit number.
2. Users of the website report difficulty viewing the map details.
 - a. The underlying map should be Google maps, since many unincorporated communities don’t appear in Bing.
 - b. Details such as streets and place names are barely visible on the map layer, and not visible at all in sections that have a planned or recent application. Please increase the opacity of the map layer, and allow users to zoom in further.
 - c. In particular, users should be able to locate sensitive sites on the map, such as schools, daycares, hospitals and parks.
3. Please include a back button that allows users to move from viewing a particular notification back to the vicinity of the search. In the absence of a back button, users report that employing the browser’s back button takes them out of the map and back to the SprayDays home page.
4. **On first loading, the map should clearly show the number of applications planned for each county.** Currently, the initial view significantly misrepresents the number of applications planned in each county, which only become evident at greater resolution. For example, in Fig. 1 below, no planned applications are shown for Kern County on first loading the SprayDays map. Upon zooming in just one click, 14 applications appear in Kern County (Fig. 2).

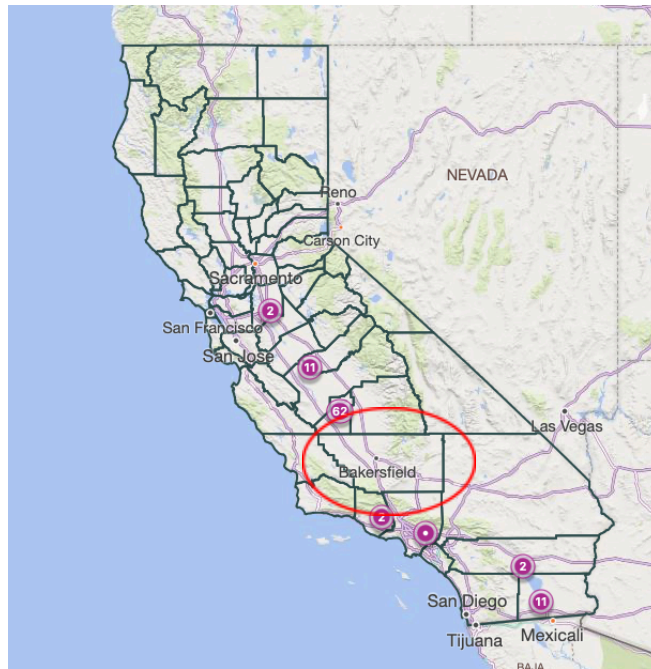


Fig. 1 (Map accessed 2/17/26)

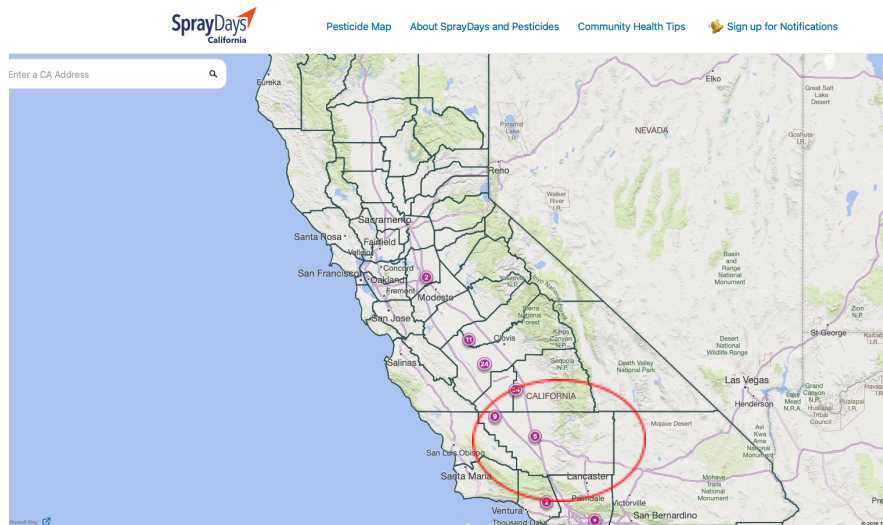


Fig.2 (Map accessed 2/17/26)

VI. Registration improvements

CPR's community organizers have amassed considerable experience assisting residents with registering for notifications, and report the following issues:

1. It often takes multiple tries (anywhere from 3-6 tries) before community members are able to register for SprayDays notification. The system takes such a long time to process registrations that the system stalls and users have to start over.
2. While attempting to register, many people receive messages that their telephone number and/or email is invalid.
3. Users have found the verification process for signing up for notifications is needlessly intrusive, and an unnecessary step. Users should not have to provide a number as well as an email to sign up.

VII. Notification improvements

1. The text notifications do not include the name of the active ingredient, necessitating an additional step by the user. Please ensure that this essential piece of information is included at the first step in all notifications.
2. Notifications currently include just the street address but not the town/city. Many rural addresses are duplicative. For the benefit of those who have signed up for multiple locations, please add the town or city to all notifications.

VIII. Other comments

1. Under 'Community Health Tips', "Reporting Pesticide Incidents" section: "How to Report Pesticide Incidents, Illnesses, or Concerns, PDF" should link to [the PDF itself](#).
2. Frequently, one active ingredient generates multiple notices for the same section on the same date. Please explain in the FAQs.

IX. Outreach

Community members have appreciated DPR's outreach efforts, especially the translated materials and advertising to multiple languages and in various media outlets.

At the same time, we ask that outreach efforts clearly communicate and emphasize the serious risks that pesticide exposure poses to human health and the environment. Omitting or downplaying this information fails to prioritize public health and does not respect the public's right to know.

We request that DPR include, in its reporting, a list of organizations it has partnered with to disseminate SprayDays information. This transparency would help identify communities that may require more effective or expanded outreach.

We ask that DPR conduct presentations for and otherwise share SprayDays resources with relevant government and employment entities, as well as sensitive sites such as schools, daycares and hospitals. We recommend DPR offer presentations to groups such as the following, and urge these entities to share the new tool with their members:

- California Association of Counties
- California Farm Labor Contractor Association
- California Teachers Association
- California Federation of Teachers
- California Nurses Association

- California School Nurses Organization
- California Association of Private School Organizations
- National Association of Hispanic Nurses
- California Primary Care Association

In light of public demand for pesticide notification, and the benefit to communities of SprayDays, we also ask that DPR direct County Agricultural Commissioners to help spread the word about this important tool. To our knowledge, only the County Agricultural Commissioners in [Madera](#), [Imperial](#), [Merced](#) and [Shasta](#) make any mention of SprayDays on their websites. We also ask that DPR urge CACs to include SprayDays in any newsletters they publish.

Sincerely,



Angel Garcia, Co-Director



Mayra Sanchez, Associate Director

APPENDIX 1

Draft format for health information to accompany community notification of proposed application (NOI) for California-restricted materials

Example: 1,3-Dichloropropene

What chemical will be applied?

Chemical name (i.e., "Active Ingredient"): **1,3-dichloropropene**

Brand name: **Telone.**

Also may be used in a combined product with the fumigant chloropicrin.

[note: if more than one AI applied, list all]

Why am I being warned about potential exposure to 1,3-dichloropropene?

- 1,3-dichloropropene is on the [Proposition 65](#) list because it can cause cancer. Exposure to 1,3-dichloropropene may increase the risk of cancer.
- 1,3-dichloropropene is classified as a Toxic Air Contaminant
- 1,3-dichloropropene can cause immediate poisoning, especially when combined with chloropicrin
- 1,3-dichloropropene causes skin or eye irritation

How is it applied?

Fumigant injected into the soil; it quickly turns into a gas

How could I become exposed?

Most likely exposure: by breathing in the gas.

Fumigant can remain in air for hours or days, as it comes out of the soil.

For more information, read the Safety Data Sheet for this product:

<https://assets.greenbook.net/M28727.pdf>

First Aid:

IF YOU HAVE SYMPTOMS OF EXPOSURE (headache, dizziness, eye irritation):

Get medical advice/ attention.

IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing.

IF EYES are irritated: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists, get medical advice/ attention.

What steps can residents take to reduce exposure?

To reduce exposure, residents should:

- 1) Close doors and windows during application.

- 2) Keep children indoors during application.
- 3) Stay away from the treated field for several days after application.

For more information:

<https://www.cdc.gov/niosh/npg/protect.html>,

How do I report pesticide exposure or drift?

Pesticide drift is illegal. Call your County Agricultural Commissioner if you experience pesticide exposure. It is their job to investigate.