

## Californians for Pesticide Reform Coalition Organization (Angel Garcia)

Dear Director Morrison and California Department of Pesticide Regulation Staff, The undersigned 80 organizations are writing to provide public comment on the SprayDays pesticide notification system. We strongly support DPR's efforts to improve transparency and protect public health through advance notification of pesticide applications. However, the current system falls short in a critical way: it does not provide exact location information for upcoming applications. We respectfully urge the Department of Pesticide Regulation (DPR) to add the precise location of each planned pesticide application to SprayDays notifications. To our knowledge, SprayDays is the only hazard notification system that does not identify the exact source of a potential exposure. Other public safety systems—such as wildfire alerts or chemical release notifications—clearly identify where the hazard is occurring so people can take appropriate protective actions. In contrast, SprayDays provides only a one-mile-by-one-mile section, which makes it extremely difficult for residents to assess their actual risk. DPR's First Annual Status Update identifies exact or more specific location information as a key piece of user feedback. Yet this central concern remains unaddressed in the current version of SprayDays. This lack of specificity undermines the purpose of the system. Without exact location information, people cannot meaningfully protect themselves. If we know where a pesticide is being applied, we can avoid that area. Without that information, we cannot. The distinction between "near" and "far" exposure matters. Some pesticides drift significant distances, while others do not. The current system does not allow residents to distinguish between an application occurring directly adjacent to their home and one occurring nearly a mile away. As a result, people are left either under-protected or overwhelmed—receiving frequent alerts without the ability to determine which ones require action. Providing exact location information would allow individuals and families to take practical, targeted precautions—such as closing windows, bringing in laundry or children's toys, keeping vulnerable individuals indoors, or avoiding areas where active applications are occurring. This is especially important for people with asthma or other respiratory conditions, for pregnant individuals, and for families with young children. It would also improve public health response. Medical professionals would be better equipped to recognize and treat pesticide exposure if they had clearer information about where highly hazardous pesticides—specifically restricted materials—are being applied. Importantly, DPR already collects this information. It is available after the fact through Public Records Act requests. There is no clear justification for withholding it in advance, when it would be most useful for protecting public health. SprayDays focuses on some of the most hazardous pesticides used in California. When residents receive a notification within a one-mile square, they cannot reasonably be expected to leave their homes every time. But they should have the ability to take precautionary actions when an application is occurring nearby—especially when it directly borders where they live, work, or attend school. For these reasons, we respectfully request that DPR revise the SprayDays system to include the exact location of upcoming pesticide applications. This simple change would significantly improve the system's effectiveness, reduce unnecessary alarm, and better enable Californians to protect their health. Thank you for your consideration and for your continued work to protect public health and increase transparency.