MEETING SUMMARY | Workshops to Develop Regulation Concepts for Field Fumigation Notifications

Department of Pesticide Regulation
Prepared by the Center for Collaborative Policy, CSU Sacramento

I. Background

The Department of Pesticide Regulation (DPR) is vested with primary authority through the U.S. Environmental Protection Agency (US EPA) to enforce federal and state laws pertaining to the proper and safe use of pesticides. As part of the California Environmental Protection Agency, DPR protects human health and the environment by regulating pesticides sales and use, and by fostering reduced-risk pest management. DPR's enforcement of pesticide use in the field is largely carried out in California's 58 counties by the County Agricultural Commissioners (CACs). In recent years, the attention of the public has focused on the use of fumigants and notification of their application to nearby residents and others. Current federal, state, and local requirements outline mandatory notification processes for certain applications of particular soil-applied field fumigants (e.g., methyl bromide). These requirements are not standardized across different fumigants. DPR intends to use current methyl bromide notification regulations and fumigant labeling requirements as a starting point to create a uniform requirement for all soil-applied field fumigants.

DPR held a public workshop in 2015 to gather initial input from stakeholders as it determines an appropriate notification process when field fumigation occurs. DPR conducted two additional workshops in April 2016. These informal public meetings preceded the formal rule-making process that will include an official comment period (expected to occur around winter 2016/2017). This document summarizes the April 2016 public workshops.

II. Workshop Design

Workshops were held in two locations (Spreckels and Fresno) on April 12 and April 14, 2016, respectively. Both workshops included dual simultaneous English-Spanish interpretation services; additional interpretation services (i.e., Mixteco and Hmong) were available at the Fresno workshop. Workshop materials in Spanish were also available. DPR staff made a brief presentation to provide context to DPR's effort to develop regulation concepts for field fumigant notifications. Most of the meeting time was devoted to public comment.

III. Welcome and Introductions

George Farnsworth, DPR Associate Director of the Pesticide Programs Division, welcomed workshop attendees and introduced DPR staff, CAC, as well as local and statewide elected officials.

IV. Workshop Purpose and Opening Remarks

George Farnsworth stated that the purpose of the workshops was to receive input on the development of new regulations for field fumigant notifications. He acknowledged that the community has many concerns, and DPR staff have come to listen and learn from the community to develop meaningful regulations that respond to the range of interests. He added that these workshops allocate more meeting time to public comments in response to feedback received from the previous 2015 public meeting on fumigant notifications.

Mr. Farnsworth presented three key questions for which DPR would like the public to provide comment:

1. What is the appropriate distance from a fumigation that should trigger notification?
2. When should notification occur?
3. What information should the notification contain?

Mr. Farnsworth then provided an overview of the process and timeline for developing regulations for field fumigant notifications. DPR is gathering input from stakeholders as an initial phase. DPR invites the public to submit comments to DPR until **May 20, 2016** (See **Section VIII** below for comment submission information). DPR will then develop draft regulations and release the draft regulations for formal public comment and hold public hearings around spring 2017. While the timeline may change, DPR intends to have the regulations finalized by summer 2018.

V. Current Requirements

Randy Segawa, DPR Special Advisor to the Director, provided background on field fumigants and the regulations that govern notifications (Refer to **Appendices A and B**). He explained field fumigants are primarily used for pests that are difficult to control (e.g., nematodes and diseases). Fumigants are gases injected into the soil which are then usually covered with tarps to minimize volitilization and exposure. Four main chemicals are used in fumigants: 1,3-dichloropropene (1,3-D), chloropicrin, methylisothiocyanate (MITC) products, and methyl bromide. Soil fumigants are frequently applied in combinations.

The required process for notification depends upon several issues such as the type of fumigant, and the distance from the buffer boundary. Growers and pesticide applicators must comply with up to three sets of requirements: federal law (US EPA labels), state law (DPR regulations), and county requirements (CAC site-specific fumigant application permits). If multiple requirements exist for a given issue (e.g., trigger distances), the grower/applicator must adhere to the more stringent requirement. Mr. Segawa focused on explaining the US EPA label and DPR regulations for fumigation notifications (summarized in the tables below) since county requirements vary across the state.

Mr. Segawa also presented the differences between the required information contained in notifications for EPA labels compared to DPR regulations. He said DPR is considering new notification requirements to establish better consistency across notification requirements, to address compliance and enforcement issues (e.g., confirming notification was delivered), and to support better communication among the various parties.

Summary of Current Notification Requirements

Issue	Federal (US EPA Labels)	State (DPR Regulation)
Fumigants	Chloropicrin, methyl bromide, MITC	Methyl bromide
Properties Notified	Residences and businesses	Schools, residences, hospitals, convalescent homes
Trigger Distances	Notify OR monitor if within 50-300 feet of buffer boundary	Within 300 feet of buffer boundary
Date Notified	At least 1 week before fumigation	2-part notification: 1) at least 9 days before fumigation; 2) 2 days prior to fumigation, if requested
Fumigation Schedule	4-week window	12-hour window
Languages	English	English and Spanish
Manner Notified	Mailings, door hangers, or similar	In writing or other means approved by CAC

Summary of Current Notification Content

Information Included	Federal (US EPA Labels) *Chloropicrin, methyl bromide, MITC*	State (DPR Regulation) *Methyl bromide*
Fumigant Name	Yes	Yes
Location of Fumigation	Yes	No
Contact Info for Property Operator	Yes	Yes
Contact Info for Applicator	Yes	No
Contact Info for local CAC	No	Yes
Specific Fumigation Date	No	Yes, if requested
Signs and Symptoms of Exposure	Yes	No
How to Find More Information	Yes	No

VI. Clarifying Questions

DPR staff were available to answer clarifying questions. The following summarizes questions posed by attendees and responses provided by DPR staff:

Chemicals and Application Methods

- A couple attendees asked DPR to clarify how fumigants differ from other pesticides.
  - DPR Response: Fumigants are a subset of pesticides and are among the 37 pesticides DPR has designated as "restricted" materials. Requirements for use of restricted materials include: applications must be conducted/supervised by a certified applicator, and the grower/applicator must have a permit from the CAC.
- Several attendees asked about regulations for specific chemicals (e.g., lime sulfur and formaldehyde).
  - DPR Response: Lime sulfur is not a fumigant or a restricted material. It does not require notifications; however, the applicator must adhere to the US EPA label requirements.
  - DPR Response: To our knowledge, the commonly used fumigants do not contain formaldehyde.
- Many attendees asked about the tools that growers/applicators use to prevent fumigant drift.
  - DPR Response: Safety measures include using a special type of highly impermeable tarp and fumigating only when wind speeds (measured with an anemometer) are below a certain threshold.

Health Concerns

- Several attendees questioned how concerned they should be when they see an applicator in full protective gear.
  - DPR Response: Keep in mind that applicators are exposed to chemicals in greater concentrations and frequency than most individuals. Therefore, applicators require more protective gear even if the pesticide itself is not a restricted material.
- Have there been incidents of illnesses or hospitalization as a result of pesticide exposure?
  - DPR Response: Yes. Several incidents have occurred. Individuals who think they have become ill from pesticide exposure should see a doctor immediately. The doctor is required to report pesticide-related illnesses through the appropriate channels in order for CACs/DPR to conduct an investigation.
- Many attendees asked whether the regulations consider long term exposure impacts.
  - DPR Response: The notification requirements for fumigation focuses on acute exposure. DPR has a different set of requirements that pertain to long term exposure.
- A few individuals asked what illnesses are associated with fumigant exposure.
  - DPR Response: MITC and Chloropicrin are eye and lung irritants, methyl bromide can affect the brain/nervous system, and 1,3-D is associated with cancer.

Regulations, Monitoring, Enforcement, and Accountability

- A large number of attendees queried about fumigant and pesticide regulations in general. DPR clarified these workshops are focused specifically on *notifications* for fumigants. The notification regulations may provide more information, but they will not change buffer zone areas, application methods, or directly address exposure risk.
- There are federal and state regulations for fumigant notifications. What is the third type?
  - DPR Response: County level regulations developed by the local CAC (and approved by DPR) outline requirements for permits to apply restricted materials on fields. As DPR regulations can only be stricter than federal regulations, county regulations can only be stricter than DPR regulations. Growers/applicators must adhere to whichever is the most stringent requirement.
- A couple attendees asked why 1,3-D does not have notification requirements like the other fumigants.
  - DPR Response: The US EPA did not evaluate 1,3-D when they recently evaluated the other fumigants, so notification for 1,3-D is not required in the latest edition of label requirements. DPR plans to consider notification requirements that apply to 1,3-D as well.
- An attendee asked DPR to clarify the timing for DPR's possible 2-part notification requirements.
  - DPR Response: For methyl bromide applications, DPR requires that growers/applicators notify nearby properties 9 days prior to fumigation (always required) and then 2 days prior (required if 2nd notification is requested). There is a 7 day difference between notifications.
- Several attendees requested DPR further explain how the buffer zone areas are determined.
  - DPR Response: The buffer zone considers the method of fumigation, the rate of application, and the number of treated acres. Air monitoring and computer modeling use this information to estimate downwind air conditions under various scenarios (e.g., different wind conditions) to determine appropriate buffer zone areas. The second zone relates to notification triggers; a major reason for these workshops is to receive input on how to determine an appropriate distance for the notification trigger zone.
- Are growers/applicators required to inform nearby workers about a fumigant application?
  - DPR Response: Under the current regulations, growers/applicators have the option to either monitor or notify business properties within the secondary notification trigger zone about a fumigation event if they use MITC, chloropicrin, and/or methyl bromide. If the grower/applicant chooses to notify, it is up to that property owner to notify his/her employees.
- A few individuals asked about the monitoring protocols growers/applicators must follow if they choose to conduct monitoring rather than issue notifications under federal law.
  - DPR Response: Growers/applicators must monitor at the edge of the primary buffer zone and take measurements as outlined on the US EPA label. If they detect an exceeded level of the fumigant, the US EPA label requires they implement an emergency response plan; the CAC must be notified to conduct a follow-up investigation.
- An attendee asked whether DPR conducts monitoring at the buffer zone boundaries.
  - DPR Response: DPR monitors at the boundary on a case by case basis.
- A number of individuals asked DPR to outline the state's process to ensure compliance and accountability in regards to fumigation.
  - DPR Response: DPR has primary authority to enforce federal and state laws; enforcement of pesticide use in the field is largely carried out by local CACs. For example, growers/applicators must receive a site-specific permit from the local CAC and notify the CAC prior to application. CACs must conduct investigations on incidents of pesticide misuse that are reported to them, then submit that information to DPR. DPR reviews the information (along with any other pertinent information) to determine whether further action is necessary. If DPR determines a violation occurred, fines may be up to $5,000 per violation. These civil penalty actions are further defined in the California Code of Regulations, Title 3, Section 6130.

VII. Public Comment

The facilitator reviewed the process for public comment. In order for all attendees to have an opportunity to speak, attendees were asked to limit their comments to a few minutes. DPR would not respond to any comments or questions offered during the public comment period. The facilitator then reviewed the three key questions for which DPR would like the public to provide comment:

1. *What is the appropriate distance from a fumigation that should trigger notification?*
2. *When should notification occur?*
3. *What information should the notification contain?*

Comments specific to the fumigant notification process are provided first, followed by recurrent themes from the comments, and then other comments grouped by category. In addition to the public comment period, attendees had the opportunity to submit written comments to DPR. Recurring issues raised in the comment cards are also embedded in this section. Transcribed written comments and other materials submitted to the DPR can be found in **Appendix C**.

Most attendees did not distinguish between fumigants and pesticides in general. This public comment section of the summary assumes attendees are speaking about pesticides in general unless noted otherwise.

Fumigant Notification-Specific Input

- **Appropriate distance to trigger notification.** Attendees provided a wide range for the suggested distance to trigger fumigant notification, varying from the current required notification distances to distances of up to 2 miles.
    - Many attendees suggested the distances should be at least one mile from the fumigation site or buffer zone to account for possible drift; a couple individuals suggested two miles. Several of these individuals also said the notification regulations should apply to all fumigants. They referenced studies that detected fumigant drift at least one mile from the fumigation site.
    - Many other attendees said the current notification requirements are appropriate. They stated the primary buffer zone around the fumigation site is based upon sound evidence and modeling; DPR should use a similar science-based approach to determine the notification boundaries. They said there is insufficient evidence to justify increasing this second zone. Several attendees also expressed concern that large notification zones would lead to properties inundated with fumigant notifications and negative indirect consequences (important notifications lost among lower-risk notifications).
- **Notification Timing**. As with the appropriate notification trigger distance, individuals suggested a wide range for the appropriate time to notify neighboring properties (generally between 4 to 7 days).
    - Many attendees conveyed they needed sufficient time to plan ahead to ensure their families are out of harm's way. Many said notifications should occur at least one week prior to fumigation; a couple individuals suggested two to three weeks. Another individual suggested a pre-season notification to provide the general expected schedule for fumigation.
    - Several attendees also suggested follow-up notifications closer to the date of proposed fumigation (e.g. 48 hours prior, 24 hours prior, and 12 hours prior in the case of delayed application).
    - Many other attendees said the current notification timing requirement for each fumigant is appropriate. The more advanced the notification, the more likely the information becomes inaccurate due to unpredictable condition changes (e.g., weather patterns). Multiple follow-up notifications may also lead to too many notifications.

  - A couple individuals suggested approximately 4-5 days prior to fumigation may be a more feasible universal notification standard for growers/applicators.
- **Notification Information**. Attendees suggested a large range of information to include in fumigant notifications.
  - Common suggestions included: name of the fumigant(s), date and time of application, symptoms of acute and chronic exposure, contact information (property owner, applicator, and CAC), on-site notification signs, mailed and door knob notifications, web-based notifications (e-mail and CAC website), telephoned notifications, and in multiple languages appropriate to the local area.
  - Additional suggestions included: pictures of symptoms, signs with large font, signs with lots of white space, who to contact during nights/weekends, signs placed at all common entrances for schools, smartphone apps or texts for notifications, automated calls through the school system, "phone trees" among teachers/parents, radio announcements, televised notifications, precautionary information from the county health department, chemicals' material safety data sheets in language understandable to the lay person (including health risks, treatment, handling and storage, etc.), and a map of the treated area.

Major Themes

- **Broader issue for pesticide regulation success**. A large number of individuals acknowledged DPR's request for input specifically on fumigant notifications; however, they spoke to the broader issues of pesticide regulation. Several said improved notification processes alone would not sufficiently protect those nearby. Others said DPR should focus on enforcement of the current regulations rather than modifying the notification process. Overall, attendees appeared to share similar perspectives that any regulations need sufficient accountability and enforcement to be successful.
- **Sustainability**. Attendees varied in whether they prioritized economic, public/worker health and safety, food security, and/or environmental sustainability. However, generally all of their comments reflected long-term thinking and visions.
- **Effective and equitable**. Whatever regulations DPR develops for fumigant notification, the regulatory system needs to be effective, implementable, and fair for everyone.
- **Safety.** Overall, attendees expressed a shared interest to protect the safety of their families, neighbors, employees, and community. Many individuals shared concerns over the health and safety of those exposed to fumigants. Several attendees also shared concerns over the safety of those who conduct in-person notifications to potentially hostile individuals.
- **Importance of agriculture**. Attendees also acknowledged the importance of agriculture in California. Many attendees came from families who work on the farms and said they directly rely on the industry to provide for their families.
- **Partnerships and collaboration**. Attendees emphasized the importance of strong relationships among growers, schools, and the community to be better informed and aware of pesticide applications and associated risks; attendees said DPR should continue to support and strengthen these partnerships, when appropriate.
- **Access to information**. Attendees highlighted the need for DPR to support access to clear, concise, and critical information for any interested parties. Attendees generally expressed that greater access to information will lead to improved understanding of the issues and will empower individuals to make informed decisions.
- **Information and evidence-based regulations**. DPR should base the proposed regulations on sound evidence and the best available science. Several attendees suggested DPR incorporate the communities' stories as anecdotal evidence. Many attendees urged DPR to develop regulations objectively and free from the influence of outside interests.

- **Land-use planning.** Many attendees said greater collaboration with decision-makers is necessary in land use planning decisions. Land use conflicts are inevitable if decision makers continue to allow schools and farms to exist in such close proximity without buffers.
- **Balance between statewide standards and local flexibility.** Many attendees stated the regulations should be simple and straight forward such that interested parties from varied backgrounds can understand the regulations. However, attendees also said that regulations need to support local flexibility, because agriculture, weather patterns, and community needs vary widely across the state.
- **Cost of implementation and funding sources.** Attendees expressed concerns over the cost and funding sources to implement the future regulations over the long term.
- **Appreciation for the public meetings.** Attendees thanked DPR for providing a forum for anyone to learn and provide their input on fumigant notifications.

Additional Public Comment

The following paraphrases additional comments from attendees grouped by issue categories.

Health and Safety Concerns

- Many of the attendees listed immediate health reactions to pesticides, such as headaches, asthma attacks, nausea, skin rash. However, they said long term effects might include chronic respiratory issues, thyroid issues, neurological damage, and cancer, all of which may lead to a shorter life expectancy. Attendees were especially concerned with the carcinogenic effects of 1,3-D.
- Many growers, Pest Control Advisors (PCAs), and a few community members stated growers and PCAs are highly concerned about public health and safety. They said growers, their families, and the field workers live in the same community as the fields; therefore growers have the incentive to use pesticides safely.
- Several attendees cited information that the combination of fumigant chemicals (e.g., 1,3-D and Chloropicrin) have enhanced detrimental health impacts than the individual chemicals used independently.
- Comment: Workers' health should be a priority for the agriculture industry. Growers need healthy workers to operate.
- Comment: If students and teachers miss school due to pesticide-related health issues, students receive a lower quality of education.

Farmworkers and parents

- Many farmworkers said they suffered from major chronic ailments, which may be due to high pesticide exposure. They said they want DPR to help protect their families from experiencing similar hardships.
- Many farmworkers shared stories of instances when they felt their health or safety was a lower priority to those in charge. They mentioned incidents such as the farmer/grower provided little training to use chemicals safely, dismissed health complaints, and/or sprayed while workers were in the area.
- Comment: Also consider that these chemicals can disperse by other means besides the weather. Farmworkers may carry traces of pesticides on their clothes back to their homes, unknowingly putting their families at risk.

Environmental justice issue

- A few individuals stated many of the communities and schools close to high pesticide use tend to consist primarily of low-income and non-English speaking populations. They called upon DPR to address this environmental justice issue.
- A few attendees mentioned that the health issues, likely caused or aggravated by pesticide exposure, are extremely costly to treat (e.g., medicine, doctor visits, hospitalization), and many of the families lack health insurance.

Cause or coincidence

- Several individuals offered the possibility that some of the health issues expressed at the workshops may be attributed to other variables. Several attendees said they worked/lived on or near farms and did not have the same ailments that several other attendees identified.

Information, analyses, and evidence-based conclusion

- Many attendees said the buffer zones derive from robust modeling and monitoring data; therefore, the buffer zones provide sufficient protection from fumigants without the need for more notification requirements.
- Many community members said DPR should have an independent research body evaluate an active ingredient's impacts on human and environmental health. Studies should also explore the effects of a combination/interaction of different pesticides. Several individuals voiced their distrust in any study results from the pesticide manufacturer or distributor.
- Comment: The proposed notification trigger distance for methyl bromide appears to be based on arbitrary decisions. Any requirement should be supported by appropriate and sufficient evidence.
- Several attendees suggested DPR provide a method for citizen science, such as self-monitoring test kits.

Education and Outreach

- A large number of the attendees underscored the power of information. They said notifications should provide sufficient information in order for people to make informed decisions regarding how to protect themselves and their families.
- Many individuals noted the complex regulations, multiple types of pesticides, and varied application methods create misunderstandings and inaccurate perceptions. For example, individuals may think that fumigant applications are occurring adjacent to schools, but fumigants cannot lawfully be applied within one-eighth of a mile of a school.
- Several individuals said increased awareness and strong relationships among the different parties will help offset general concerns.
- A few attendees mentioned that doctors need to be trained to diagnose pesticide-related symptoms. Fumigant notifications that list the chemical(s) and symptoms will also help doctors' diagnoses.
- Several attendees encouraged DPR to conduct targeted outreach to non-English speaking field workers (e.g., through community-based organizations) to educate them about the pesticide hazards and precautionary measures.
- Comment: One participant requested that DPR host a forum to discuss the available science and to increase mutual understanding among community members.

Pesticide Application Regulations - Current Voluntary and Required Processes

Current methods and requirements for pesticide applications

- Many attendees stated California has the most stringent restrictions in the country through its federal, state, and county requirements.
- A few individuals referenced a recent study by the University of California, Los Angeles that found pesticide labels to be outdated, and recommended that updates should include independent testing and monitoring to avoid perceived conflict of interest by industry interests.
- Comment: When pesticides are applied properly and judiciously by professionals, such as a PCA-licensed applicator, pesticides are valuable agricultural tools. New technologies such as the Totally Impermeable Film (TIF) tarps also substantially reduce emissions from fumigants.
- Many of the attendees spoke of schools close to fields and that the schools were not sufficiently notified of pesticide applications, risking the health of students, teachers, and staff.
- To underscore the need for further protections, several attendees in Salinas cited fumigant drift incidents where pesticide concentrations were above safe standards (e.g., 2005 and 2012).
- Comment: DPR should address possibly unsafe pesticide applications in the private sector, not just in the fields.

- An attendee expressed concern over the other significant number of pesticides for which DPR does not require notifications.

Pesticide Regulations - Considerations

Information overload with diminishing effectiveness

- Many individuals said that if DPR requires more notifications for fumigants, the warnings can lose their value because people might view all the notifications as general "background noise."

Accountability and enforcement

- Many individuals urged DPR to address how to better enforce the existing restrictions rather than create new rules.
- Several attendees shared concerns about reporting transparency when growers/applicators can opt to monitor rather than notify local properties of a fumigant application. They questioned how regulators can confirm accurate and sufficiently representative monitoring data.
- Comment: Certain growers and pesticide applicators may follow best management practices to avoid accidental pesticide exposure to schools, but DPR needs regulations to address the growers who do not follow these practices and ensure statewide safety precautions.

Alternative methods

- A large number of attendees urged DPR to embrace innovative agriculture methods throughout the state. DPR should be at the forefront to provide the support and incentives for farmers to phase out dangerous materials and move towards truly organic and sustainable agriculture. One attendee recommended his company's new organic product against verticillium damage as a possible alternative.

Increased operation costs

- Many individuals said that if DPR adds more pesticide regulations, growers' operational costs will increase. Growers will need to raise food prices, and that cost burden will fall onto customers and/or taxpayers. This will only exacerbate the hardships for those who already face food insecurity.
- Several individuals said farming organically may not be economically feasible for many growers. Many farmers who have converted to organic methods lose money.
- Comment: The cost to do business should reflect the true cost of protecting human health.

Pesticide prohibition

- Attendees suggested different degrees of pesticide prohibition - prohibit fumigant applications near difficult-to-evacuate facilities such as schools, prohibit applications under certain conditions, or prohibit all pesticides in California.

Partnerships and Collaboration

- Attendees generally shared a similar perspective that the best path forward is through understanding, respect, unity, and good communication. The whole community, growers included, need to work together; the surrounding community also relies on the farms prospering.
- A couple individuals noted that the community as a whole needs to work together to develop funding sources to implement safer farming methods that meet the community and the growers' needs.

Leadership Responsibility

- Many individuals shared concerns over the influence of the chemical companies and distributors on pesticide regulations. They urged DPR not to support companies and/or growers' actions that prioritize profits over public health and safety.
- Several individuals expressed dissatisfaction with the regulatory progress to protect the community's health thus far. A few conveyed that they have provided substantial information over many years without receiving adequate response from decision-makers.

Public Meeting-Specific Comments

- Many attendees stated they traveled many hours to attend these public workshops, which indicates how important this issue is to them.

- A few attendees suggested DPR conduct workshops or support workshops in counties across the state.
- A couple individuals at the Fresno workshop suggested DPR conduct more extensive outreach because there did not appear to be sufficient attendance by Fresno residents.

VIII. Closing Remarks

Mr. Farnsworth thanked attendees for sharing their experiences and providing their input. He recommended attendees refer to the DPR website for the public meeting materials and other related information: http://www.cdpr.ca.gov/docs/emon/vocs/vocproj/notification_fumigations.htm

Mr. Farnsworth also reiterated that the public can submit written comments by **May 20, 2016** to:

Mr. Randy Segawa, Department of Pesticide Regulation
PO Box 4015, Sacramento CA 95812-4015, or
randy.segawa@cdpr.ca.gov

IX. List of Appendices

Appendix A – Public Workshop Agenda and Background Notice

Appendix B – Public Workshop Presentation Slides

Appendix C - Transcribed Written Comments & Materials Submitted During the Public Workshop

APPENDIX A

Department of Pesticide Regulation

Brian R. Leahy
Director

Edmund G. Brown Jr.
Governor

NOTICE
Workshops to Develop Regulation Concepts for Field Fumigation Notifications
March 18, 2016

The Department of Pesticide Regulation (DPR) will be holding two workshops (as listening sessions) to gather input from stakeholders to help us determine what notification is appropriate when field fumigation occurs. DPR will use this input to develop a new regulation.

Background

Current regulations require notification of residents and others about certain applications of the soil-applied field fumigant methyl bromide (see attachment). In addition, certain other soil-applied field fumigants, including methyl bromide, have product labels with different notification requirements as part of the emergency preparedness and response measures (see attachment). Current methyl bromide notification regulations and fumigant labeling requirements will serve as a starting point to create a uniform requirement for all soil-applied field fumigants

Workshop Dates, Locations, and Format

Workshops are scheduled at the locations and times listed below. Simultaneous interpretation will be available for the workshops as indicated below. As described in the last paragraph, contact Mr. Randy Segawa if translation to other languages is needed. All workshops will be facilitated by the California State University, Sacramento–Center for Collaborative Policy.

Salinas area
April 12, 2016, 6:00 p.m. – 9:30 p.m.
Spreckels Veterans Memorial Building
90 5th Street
Spreckels, CA 93962
Spreckels is approximately 1.5 miles southwest of Salinas.
The workshop will include simultaneous Spanish interpretation.

Fresno area
April 14, 2016, 6:00 p.m – 9:30 p.m.
Mosqueda Community Center
4670 E. Butler Avenue
Fresno, CA 93702
The workshop will include simultaneous Spanish and Hmong interpretation.

Agenda

- Introductions and opening remarks
- DPR presentation on current requirements and comments from 2015 workshop
- Public comments
- Next steps and closing remarks

Submittal of Comments

DPR is accepting comments on regulation concepts for fumigation notification before, during, and after the workshops. Comments may be submitted in writing by May 20, 2016 to:

Randy Segawa
Department of Pesticide Regulation
PO Box 4015
Sacramento, CA 95812-4015
Email: Randy.Segawa@cdpr.ca.gov

Any comments previously submitted in response to the April 9, 2015, workshop in Sacramento do not need to be resubmitted. NOTE: DPR is addressing application notification for pesticides in general specifically in the vicinity of schools in a separate regulation.

Additional Information

The facilitator may impose time limits for public comments based on the time available and the number of people providing comments. If you require additional information, special accommodation or language needs, or need this document in an alternate format (i.e. Braille, large print), please contact Mr. Randy Segawa at <Randy.Segawa@cdpr.ca.gov> or 916-324-4137 as soon as possible, but no later than 10 business days before the scheduled workshop.

Requirements for Neighbor Notification of Field Fumigations

Regulations for methyl bromide in effect since January 14, 2001

Title 3, California Code of Regulations, section 6447.1. Methyl Bromide Field Fumigation Notification Requirements.

(b) Notification to Property Operators.
(1) The operator of the property to be treated shall assure that operators of the following properties within 300 feet of the perimeter of the outer buffer zone receive notification that a permit to use methyl bromide near their property has been issued by the commissioner: properties that contain schools, residences, hospitals, convalescent homes, onsite employee housing, or other similar sites identified by the commissioner. Notification shall be in writing, in both English and Spanish, or by other means approved by the commissioner. The operator of the property to be treated shall assure that notification is delivered at least seven days prior to the submission of the notice of intent. The notification shall include the following information:

(A) the name of the chemical(s) to be applied;
(B) name, business address, and business telephone number of the operator of the property to be treated;
(C) name, business address, and business telephone number of the commissioner;
(D) the earliest and latest dates that the fumigation will start; and
(E) how to request subsequent notification of specific date and time of the fumigation.

(2) The operator of the property to be treated shall assure that specific notification of the date and time of the start of the fumigation and anticipated expiration of buffer zones is provided to those persons notified in (b)(1) who request specific fumigation information. This specific fumigation notification shall be provided at least 48 hours prior to starting the fumigation. If a request for specific notification is received after the submission of the notice of intent and before the fumigation begins, the specific fumigation notification shall be provided prior to starting the fumigation, but the 48-hour requirement shall not apply. If the fumigation of an application block does not commence within the time frame specified in (a)(2)[1], then a new notification must be provided to those persons who requested the information, but the 48-hour requirement shall not apply unless required by the commissioner.

Label requirements for methyl bromide, chloropicrin and pesticides that generate methyl isothiocyanate (MITC) in effect since December 1, 2012

Notification is one of two options under the Emergency Preparedness and Response Measures requirements.

Emergency Preparedness and Response Measures:
If the buffer zone is 25 feet, then the Emergency Preparedness and Response Measures are not applicable.

[1] (a)(2) requires that "The fumigation shall not commence sooner than the intended starting time or later than 12 hours after the intended starting time specified on the notice of intent."

Triggers for Emergency Preparedness and Response Measures
The certified applicator must either follow the directions under the Fumigant Site Monitoring section or follow the directions under the Response Information for Neighbors section if:

the buffer zone is greater than 25 feet but less than or equal to 100 feet , and there are residences or businesses within 50 feet from the outer edge of the buffer zone, or

the buffer zone is greater than 100 feet but less than or equal to 200 feet , and there are residences or businesses within 100 feet from the outer edge of the buffer zone, or

the buffer zone is greater than 200 feet but less than or equal to 300 feet, and there are residences or businesses within 200 feet from the outer edge of the buffer zone, or

the buffer zone is greater than 300 feet or the buffer zones overlap, and there are residences or businesses within 300 feet from the outer edge of the buffer zone.

Response Information for Neighbors
NOTE: Response Information for Neighbors is ONLY required if the Emergency Preparedness and Response Measures are triggered AND directions from the Fumigant Site Monitoring section are not followed.

The certified applicator supervising the application must ensure that residences and businesses that trigger the requirement have been provided the response information at least 1 week before the application starts. The information provided may include application dates that range for no more than 4 weeks. If the application does not occur when specified, the information must be delivered again.

Information that must be included:

- The location of the application block.
- Fumigant(s) applied including the active ingredient, name of the fumigant product(s), and the EPA Registration number.
- Contact information for the applicator and property owner.
- Time period in which the application is planned to take place (must not range more than 4 weeks).
- Early signs and symptoms of exposure to the fumigant(s) applied, what to do, and who to call if you believe you are being exposed (911 in most cases).
- How to find additional information about fumigants.

The method used to share the response information for neighbors can be accomplished through mailings, door hangers, or other methods that will effectively inform the residences and businesses within the required distance from the edge of the buffer zone.

APPENDIX B

California Environmental Protection Agency
Department of Pesticide Regulation

Workshop to Develop Regulation Concepts for Field Fumigation Notifications

April 2016

Agenda

- Welcome, introductions, agenda review
- Opening remarks
- Current requirements
- Public comments
- Next steps and closing remarks

Opening remarks

- Purpose of meeting
- 2015 workshop in Sacramento on fumigation notification
- Key questions/issues
  - What is the appropriate distance from a fumigation that should trigger notification?
  - When should notification occur?
  - What information should the notification contain?

Opening remarks – process and timeline

2015

1st public workshop

April 2016

Additional public workshops and informal comment

Spring 2017 (approximate)

DPR proposes regulation for formal comment and public hearings

Summer 2018 (approximate)

Regulation becomes effective

Background: fumigants are applied to fields prior to planting

- Fumigants are used for weeds, diseases, nematodes, and insects that are difficult to control

- Fumigants are injected into the soil with a tractor or applied through drip irrigation, and usually covered with a tarp

Verticillium damage in strawberries

Tractor shank injection fumigation

Drip Fumigation

From Ajwa

Background: bystanders may be exposed to fumigants because they are gases applied in high amounts

- Fumigants can volatilize from soil and move away from fields
- Soil fumigants are frequently applied in combinations

Fumigant	Example Products
1,3-dichloropropene (1,3-D)	Telone, Inline
Chloropicrin	Tri-Clor, Pic-Clor
Dazomet (MITC)	Basamid, Temozad
Metam-potassium (MITC)	K-pam, Sectagon K-54
Metam-sodium (MITC)	Vapam, Sectagon 42
Methyl bromide	Tri-Con, Terr-O-Gas

Background: growers and applicators must comply with up to 3 sets of requirements

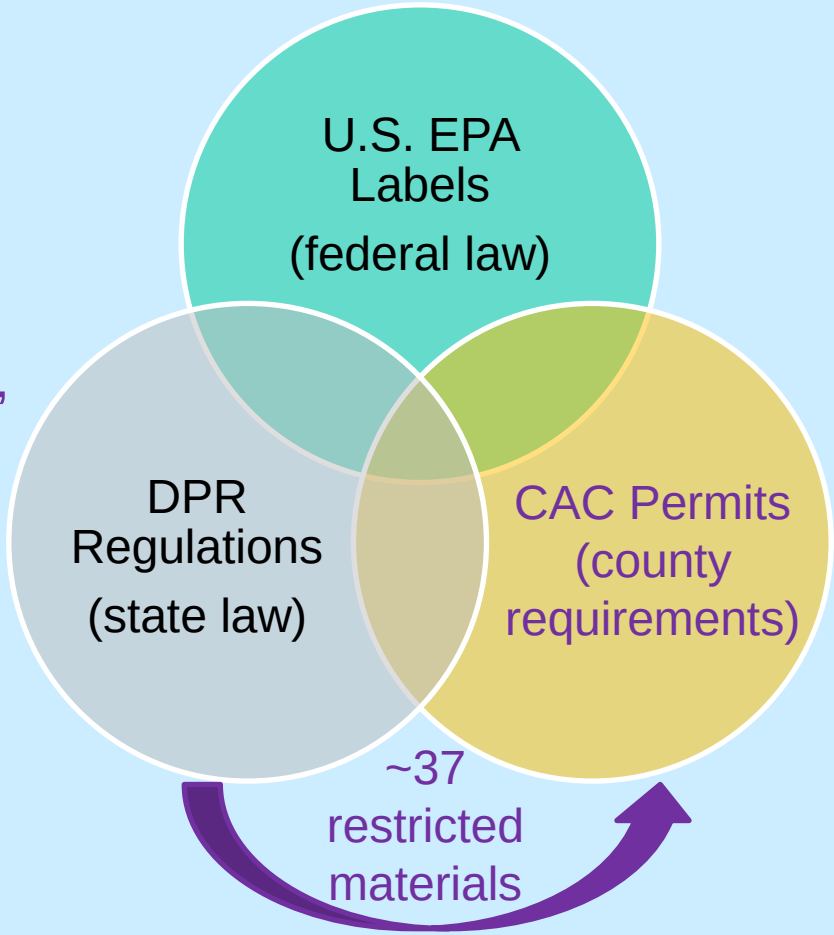
Label is the law

DPR regulations can be more stringent

DPR regulations designate some of the 1000+ pesticides as restricted materials, requiring

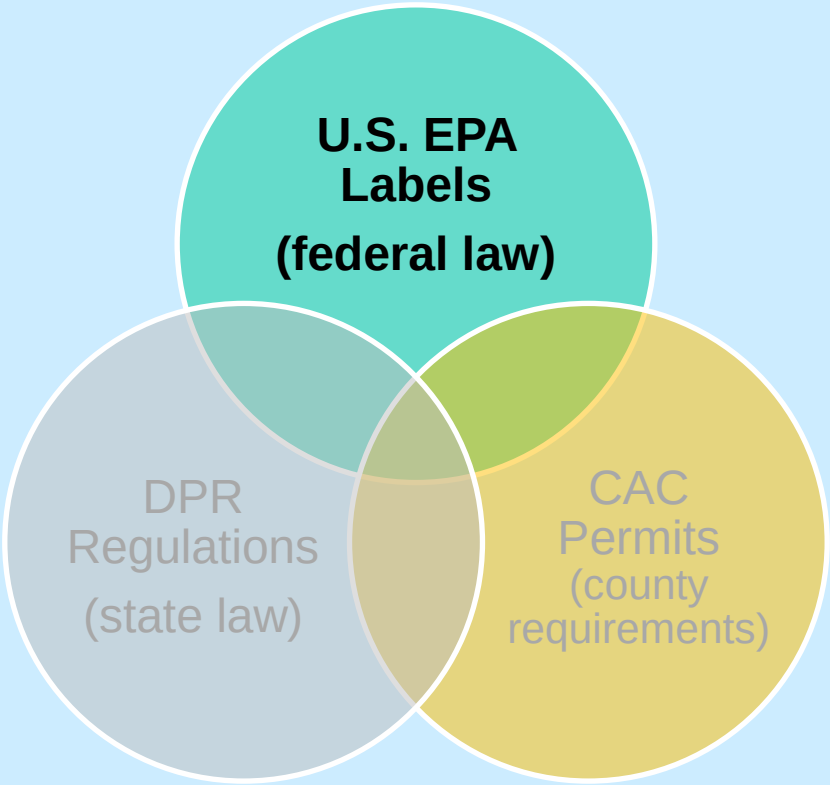
- Applications to be made or supervised by a certified applicator
- A permit from the county agricultural commissioner (CAC)

<u>All fumigants are restricted materials</u>

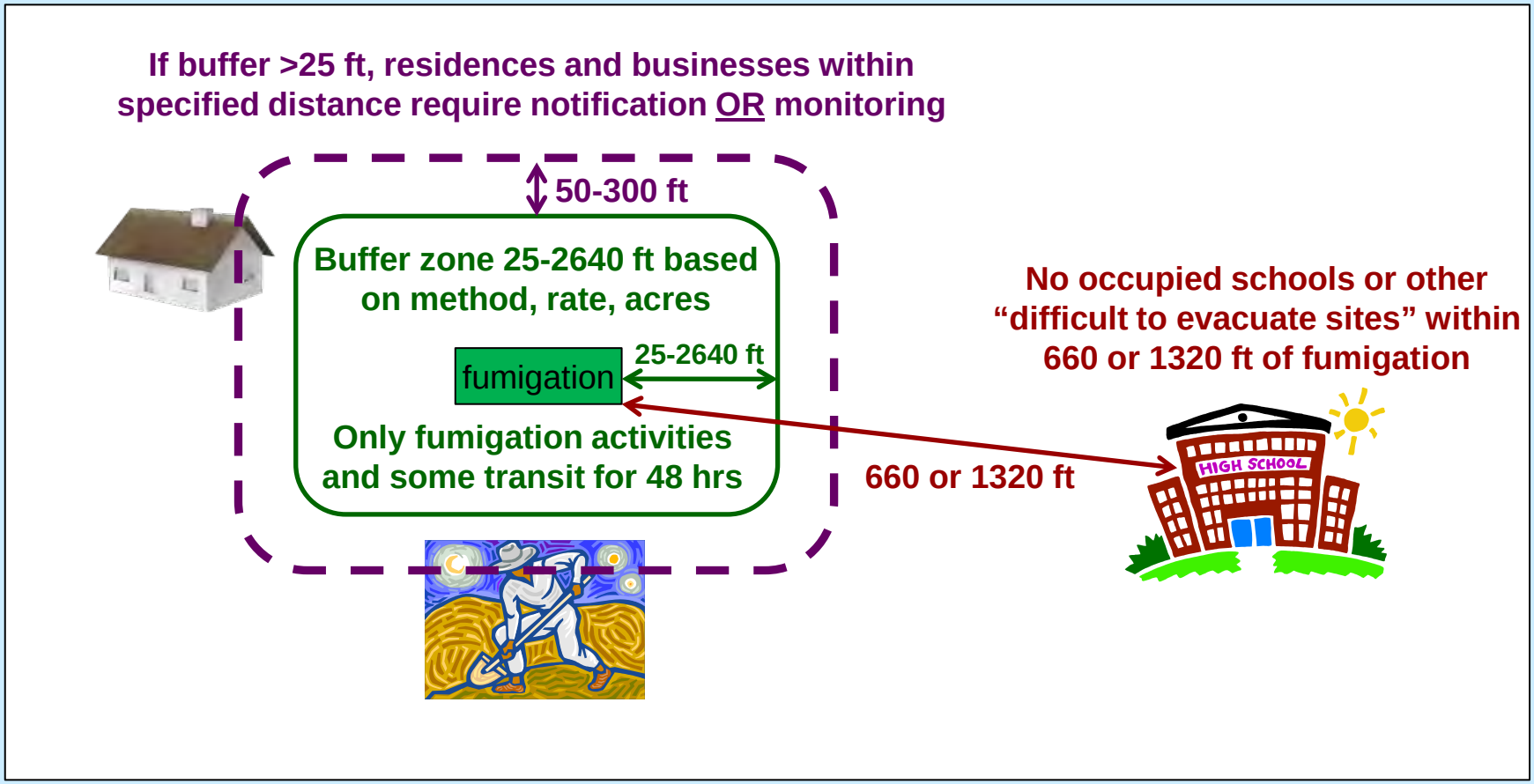


U.S. EPA label (federal law) requirements for fumigation notification

- EPA label requirements differ from DPR regulations



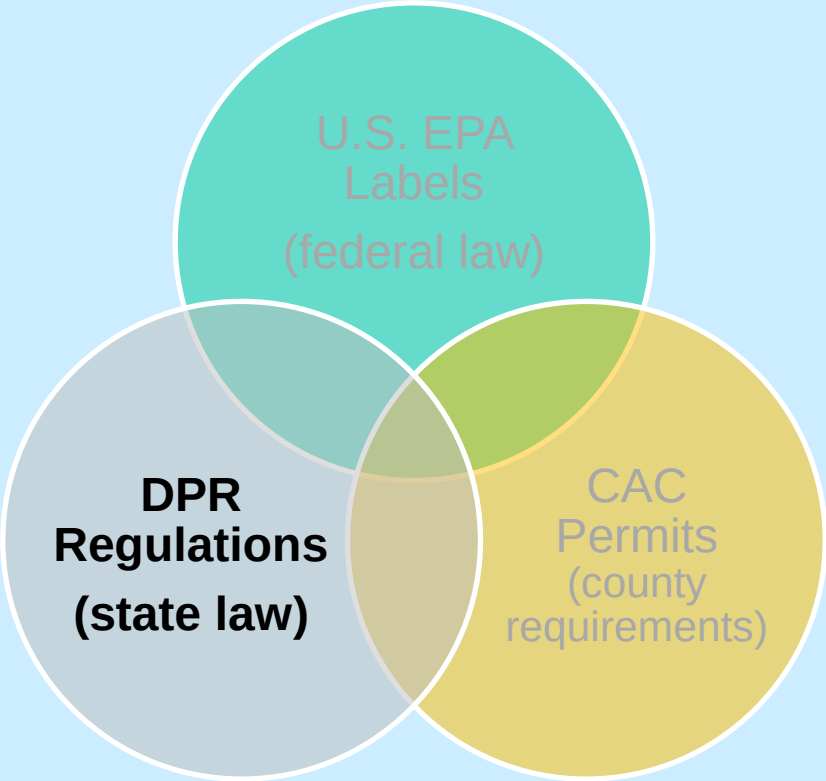
Current EPA labels for fumigants* require buffer zones and related restrictions



*Not required for 1,3-D

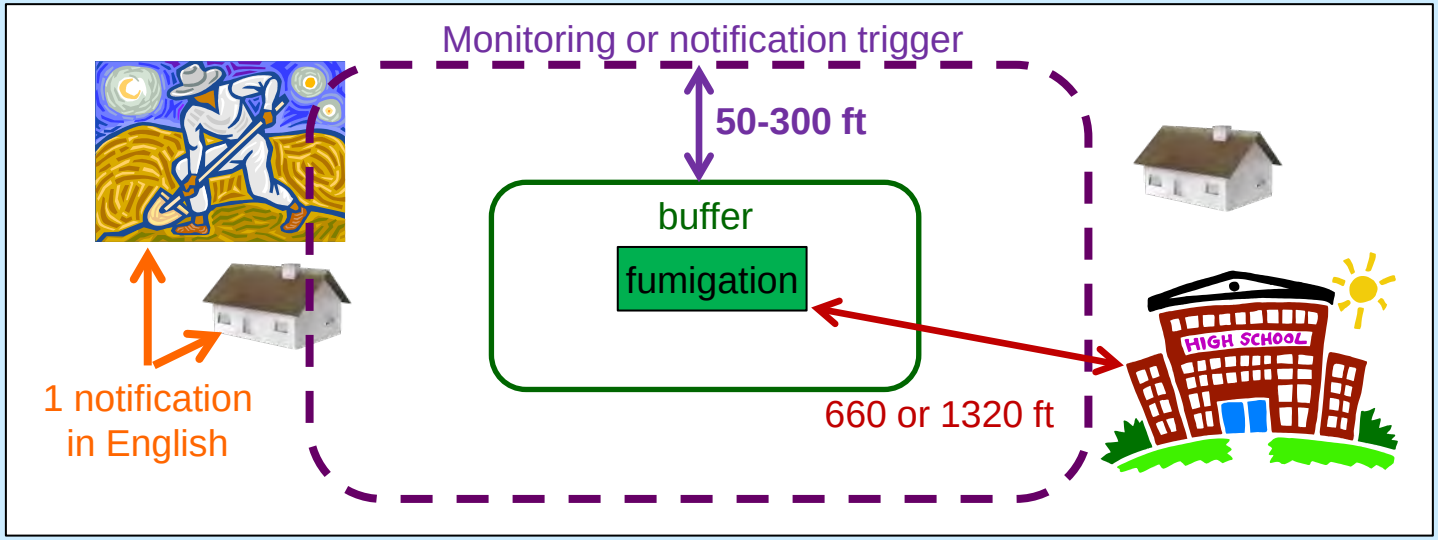
Current DPR regulations require notification of methyl bromide fumigations

- DPR requires a 2-part notification for methyl bromide
  - Part 1: general notification provided at least 9 days prior to fumigation
  - Part 2: if requested, specific notification provided at least 2 days prior to notification

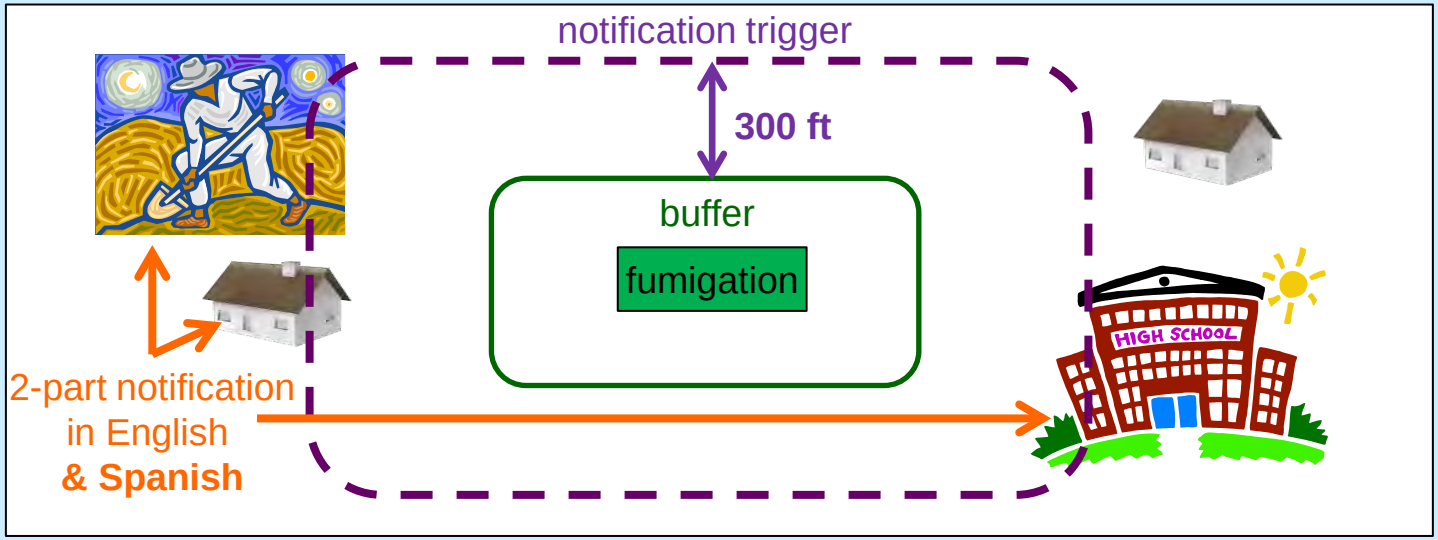


EPA and DPR have different current notification requirements

EPA Label
(chloropic, MB, MITC)



DPR Regulation
(MB)



New notification requirements will consider other issues

- Compliance and enforcement issues
  - Difficulty in notifying certain properties, such as gated properties
  - Difficulty in identifying person who should be notified for properties with multiple residences or businesses (e.g. apartments)
  - Confirming that notification was delivered
- Current county permit conditions
- Schools – notification will be addressed in a separate regulation

Summary of current notification requirements

Issue	EPA Labels	DPR Regulation
Fumigants	Chloropicrin, methyl bromide, MITC	Methyl bromide
Properties notified	Residences & businesses	Schools, residences, hospitals, convalescent homes
Trigger distances	Notify OR monitor if within 50-300 ft of buffer	Within 300 ft of buffer
Date notified	At least 1 week before fumigation	2-part notification: 1) at least 9 days before fumigation; 2) 2 days prior to fumigation, if requested
Fumigation schedule	4-week window	12-hour window
Languages	English	English and Spanish
Manner notified	Mailings, door hangers, or similar	In writing, or means approved by ag commissioner

Summary of current notification content

Information Included	EPA Labels (chloropicrin, methyl bromide, MITC)	DPR Regulation (methyl bromide)
Fumigant name	Yes	Yes
Location of fumigation	Yes	No
Contact info for property operator	Yes	Yes
Contact info for applicator	Yes	No
Contact info for ag commissioner	No	Yes
Specific fumigation date	No	Yes, if requested
Signs and symptoms of exposure	Yes	No
How to find more information	Yes	No

Questions?

- Workshop notice/agenda includes exact text of current requirements
- Presentation and other information will be available on DPR's website:
  - www.cdpr.ca.gov
  - "Quick Links" tab
  - Regulations link
  - Regulations Under Development
- Submit comments in writing by May 20 to

  Randy Segawa
  Department of Pesticide Regulation
  PO Box 4015
  Sacramento, CA 95812-4015
  Randy.Segawa@cdpr.ca.gov

Public comments

- Public comment process guidelines and instructions
- Key issues
  - What is the appropriate distance from a fumigation that should trigger notification?
  - When should notification occur?
  - What information should the notification contain?

Next steps and closing remarks

2015
1st public workshop

April 2016
Additional public workshops and informal comment

Spring 2017 (approximate)
DPR proposes regulation for formal comment and public hearings

Summer 2018 (approximate)
Regulation becomes effective

Additional information and submitting comments

- Workshop notice/agenda includes exact text of current requirements
- Presentation and other information will be available on DPR's website:
  - www.cdpr.ca.gov
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California Department of Pesticide Regulation
Workshops for Fumigation Notification
April 12 – 14, 2016

Departamento de Reglamentación de Pesticidas de California
Talleres para Notificación de Fumigaciones
Abril 12 – 14 de 2016

Name Nombre	Organization Organización
Francisco Lopez	PCA

Please write your comments here if you prefer to submit them in writing, or have them read for you.
Por favor, escriba sus comentarios aquí si prefiere someterlos por escrito, o que sean leídos para usted.

Should elaborate on school notification for "FUMIGATION" in Monterey County and Santa Cruz County are notified at least 5 days in advanced. Teachers and community are getting mixed up with difference on regulations from pesticides (herbicides, fungicide etc.) to fumigants.

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Talleres para Notificación de Fumigaciones
Abril 12 – 14 de 2016

Name
Nombre

Organization
Organización

Elizabeth Golden

Please write your comments here if you prefer to submit them in writing, or have them read for you.
Por favor, escriba sus comentarios aquí si prefiere someterlos por escrito, o que sean leídos para usted.

Please enforce 1 mile and 1 week notification, around schools, homes, & bussinesses. A low cost way to notify would be a text, list serve, email, Robo and website (people could check for more info.). The info. included in notification is date & time of application, the fumigant being applied, poss. side effects, & what to do and who to contact if effected. Thank you!

April 10, 2016

Brian R. Leahy, Director
Department of Pesticide Regulation
1001 I Street, P.O. Box 4015
Sacramento, CA 95812-4015

RE: DPR Hearing in Spreckels CA on April 12, 2016

Dear Mr. Leahy,

The Hispanic Chamber of Commerce of the Central Coast welcomes you to Monterey County and the Central Coast as you initiate your series of public hearings for your study of the notification of pesticide application by farmers in California.

Althought this matter is not our area of expertise as a chamber, we can assure you that the interest and concern about this issue has surfaced quickly. Therefore, as we looked into the matter we were please to see that California has indeed the strictest notification requirements in the country for fumigants.

We feel confident that these regulations have been improved, updated over time in order to protect farmers, workers and the community, and the concerns and complaints of the past are behing us. It appears the challenge, as in every endeavor, is compliance; and we certainly urge you to continue focusing on this aspect of the issue.

As for the authors of the recent change, it appears that there is not enough consideration or understanding of the tremendous workload on those already doing what is needed in the Ag community – large and small, without adding any additional level of safety by their propose recommendations.

Additionally, it is apparent that the unneeded cost of this proposed work will be placed on every Californian, including the hard working people in our community and especially small, mico enterprise business entites that we serve in California. This burden is unnecesarry and we ask that you continue with your due diligence, which we trust will include this importance part of the equation.

Finally, as there is no science-based evidence indicating a need for change to current fumigation notifications in California, we urge you to carefully assess the best course of action, moving forward.

Sincerely yours,

Julio Gil,
Hispanic Chamber of Commerce of the Central Coast
1121 Baldwin Street
Salinas, CA 93906

cc: CCHCC Board Members

Latino *Seaside Merchants Association*
1048 Broadway Avenue
Seaside, CA 93955

April 10, 2016

To: Department of Pesticide Regulations (DPR)
Fr: Veronica Morales, Latino *Seaside Merchants Association*
Re: Spreckels DPR Meeting – April 12, 2016

It has come to our attention of your visit to Monterey County regarding your study of the notification of pesticide application by farmers throughout the Central Coast and the state.

Our preliminary research shows that our state has the strictest notification requirements in the nation regarding the governing fumigants and that these regulations protect workers and the community. In addition, we have found that there is no science-based evidence that indicates that there is a need for change to current fumigation notifications in California.

Unfortunately, those promoting change do not care that this will add a tremendous workload on those already doing what is needed without adding any additional level of safety.

And as an organization representing small, mom 'n pop, Latino business owners, we must ask the question: *Who will pay for the cost of this new regulation? The promoters?* Probably not. Most likely, payment will continue to be the burden of tax payers: struggling, hard working families that are trying to make ends meet each day – just like all small, mom 'n pop business owners from all sectors in the community.

Perhaps these promoters really do not know what it is being a member of a minority community; let alone, a minority small business owner, that struggles daily to meet their financial obligations, in order to serve its community.

Thank you for your visit and bringing the study session to Monterey County; and thank you for taking our perspective into consideration.

Sincerely yours,

Veronica Morales

Veronica Morales, Government Relations Representative
Latino *Seaside Merchants Association*

Owner – San Pablo Bakery
1048 Broadway Ave.
Seaside, CA 94955
831-393-1111

cc: *SMA* Board Members

- Good evening, My name is Ernie Leyva
    - I am pest control advisor working in the private industry here in Santa Cruz and Monterey Counties
    - I first moved to this area in 2007. I'm originally from the central valley, I was born and raised in Fresno. I attended Fresno State University and graduated with a bachelor's in environmental ecology in 1998. Before moving up here, I worked for the USDA. Our primary focus was in trying to find viable alternatives for commercial pesticides that are currently used. Now research for alternatives has been ongoing for several decades and dozens of products have been tested up and down the state. Some have shown promise but there is still research to be done that will take years of testing but unfortunately the majority of these products have not been economically or effectively viable. I can honestly say that I'm one of the few persons who have been on both sides of the spectrum when it comes to pesticide use and regulation.
- I'm here to address the proposed regulations and the unintended consequences they will undoubtedly result in.
    - California is the 8th largest economy in the world. The majority of our revenue is due to the billion dollar ag industry. 75% of the strawberries supplied to the nation come from our area alone. 25% of the strawberries to the world. It's not a surprise to find Watsonville strawberries in china or India. Yet as big as an impact California has on the global economy not too long ago we were on the brink of being completely broke, we're still in the red but have been working towards getting out of debt. It has been theorized, with plenty of facts that a major contributor to the debt of California is due to over regulation. California has the strictest conditions and regulations than any other state in the nation. The farming practices in the tri-county area are under a 3 tier regulatory system. The federal govt, which is the EPA, the state, which is DPR and each individual county also imposes their own set of conditions to the regulations. These safety regulations and conditions are based on research from soil samples and emissions of fields that use pesticides. Buffer zones and notification zones are determined based on the science of these findings. These proposed regulations will unfortunately have negative consequences rather than making the practices of pesticide use any safer from an already exceptionally safe regulatory system.
        - In Monterey County alone, approximately 1 in 4 households depend on income from agricultural job. (referenced from the farm bureau). By imposing these proposed regulations what likely will occur is what some analyst call the "Wal-Mart" effect. Wal-Mart is the largest grocer in the nation that sells produce at a very cheap price. They do this by cutting corners with their employees, they don't employ their people full time thus saving on insurance and benefit costs. They have managed to put mom and pop stores out of business because the smaller grocers cannot compete with the giant. The same thing will happen with the small farmer. The farmer who only grows on 2-4 acres and has only 3-4 full time employees will find himself with additional costs due to these proposed regulations.

- For Example; the proposed 1 mile radius of notification. If you look at a google earth image of our area and see all the ranches in these counties you will see that almost everyone lives within a mile of any given ranch at any given time. We're talking about thousands of paper notifications that would have to be delivered, many residents would receive notices 6-10 times a year due to surrounding ranches that overlap. Each township is only a 6X6 mile square and there's dozens of ranches within all these townships. Combine that with a robo-call as well not only would this practice become very costly but eventually redundant as well. Not sure how many small growers can keep up with that cost year after year before they have to file for bankruptcy.
- The primary reason we're speaking to you tonight is not to debate this issue but rather to plead to your sense of humanity and in hopes of reconsidering this proposition and the overall damaging effects it will have on the smaller growers. If these propositions go through it will be a matter of time before the small grower is cut out of business. It could be soon or later, regardless it will be a struggle for him to stay above water. The small farmer doesn't know why these things would happen to him. He only knows that he works hard, he gets his hands dirty he provides for his family and he brings food to the table for you and me.

- California already has the most stringent regulations in the nation. We already have tough practices that minimize the risk of exposure for both applicators and bystanders. These strict regulations are based on science and evidence rather than ideologue, personal bias and heavy emotions.
- Please reconsider the ramifications and consequences that will surely occur if these regulations are imposed on an already, scientifically proven safe practice that California imposes

- Thank you for your time.

California Department of Pesticide Regulation
Workshops for Fumigation Notification
April 12 – 14, 2016

Departamento de Reglamentación de Pesticidas de California
Talleres para Notificación de Fumigaciones
Abril 12 – 14 de 2016

Name / Nombre: Suguet Lopez

Organization / Organización: Lideres Campesinas

Please write your comments here if you prefer to submit them in writing, or have them read for you.
Por favor, escriba sus comentarios aquí si prefiere someterlos por escrito, o que sean leídos para usted.

* 1 week of fumigant notification.

* Notification should include (property operator and applicators') full contact information, date of fumigant application, specific fumigant that is being applied, notification should be in languages that represent the community being informed and in writing.

* Fumigant notifications should be issued in a one mile distance from fumigation to sensitive sites.

NOTE: Would be [illegible] impacted residents in other counties too!

4/14

4-13-16

To whom it may concern,

I am writing this letter to show my concern about the pesticides that are being sprayed around the schools. As a parent and member of the comunity I would like this issue to change. My children have not being affected yet because there school is not surrended by fields but in a year my oldest will be attending Mt. view. I do have nephews that attend there and they have showen some simptoms like headaches and dizzyness. Notifying the school when pesticides will be sprayed is a good idea, but I would like if they could just spray on weekands. I also would like to point out that last years a farmer was spraying pesticides on a field while students were outside and that is a concern. It is very important for parents to assist meetings, workshops, or anywhere where they can be informed about pesticides, ~~but~~ or voiced there concerns, but it is very hard when they need to drive far. I highly suggest that you can schedule a workshop in Bakersfield, so that parents from Lamont, Arvin, and Weedpatch can attend. The insident that I refred to happened at Mt. View middle school and it was different pesticides that was in one application and students where coming out of ~~recess~~ lunch recess. This is a serious issue please take in consideration for the well being of the students.

Rocio Arrizo

California Department of Pesticide Regulation
Workshops for Fumigation Notification
April 12 – 14, 2016

Departamento de Reglamentación de Pesticidas de California
Talleres para Notificación de Fumigaciones
Abril 12 – 14 de 2016

Name Nombre	Organization Organización
MEDHA CHANDRA	PESTICIDE ACTION NETWORK

Please write your comments here if you prefer to submit them in writing, or have them read for you.
Por favor, escriba sus comentarios aquí si prefiere someterlos por escrito, o que sean leídos para usted.

Over 30 million pounds of 3 fumigants - chloropicrin, metam salts & Telone were applied in CA in the last year on record - 2013, with heaviest use being in the Central Coast & Central Valley. Comment made by community members so far have shown that community exposure to fumigant pesticides is a common occurance in the Central Valley.

Not only are fumigants prone to drift when applied (for example if tarps rip or otherwise fail, which is not uncommon), but they also tend to volatalize after application, increasing chances of exposure to communities.

Exposure to these fumigant pesticides increases people's cancer risk, possibly exponentially. Thx. Feb 2016 report.

released by UCLA documents an increased cancer risk when fumigants are used in combination. There are serious questions around the potential effects of cumulative exposure to fumigants that have not been addressed by DPR.

The fumigant notification rules are a vital tool in helping protect communities in areas where fumigants are applied. Communities have a right to know in advance of fumigant applications so that they can take protective actions like staying indoors, keeping kids inside & closing home and school windows etc.

This bilingual notification needs to be done at least a week in advance of a scheduled fumigation and provided by mail or hand delivery to residences includ labor camps, schools, daycares, other institutions & busines within the notification area.

This notification must be done for fumigant application happening upto a mile away. Many robust studies document pesticide exposure - including from fumigants - upto a mile away from the site of application. I can submit a list of studies supporting the need for a 1 mile zone of notification

April 13, 2016

To whom it may correspond:

I am a member of the Lamont Community. I have family in this district. As a mother, I am concerned regarding pesticides. My first son was doing very well while attending Mt. View elementary school. Before the school year was over, my son complained of having headaches and dizziness. I thought this was part of his growth develop. I took him to the doctor and he was diagnosed with migraines. I got so frustrated because I did not know what to do. Now, that I have more knowledge regarding pesticides, I don't have any doubt that pesticides are the cause of his symptoms. I am going to do my best to be informed with respect to pesticides. Farmers need to inform schools and the Community when they are going to spread the pesticide. Moreover, I would like if you can bring the workshop closer to our community. It is difficult for us to travel, and also the time is very inconvenient for us. I am greatful you read my letter, and to create an environment for change! For the well-being of our children!

Thank you

Claudia Aunigio

1 de 2

4/14
4-13-16

Hola,

Como miembro de Lamont y padre que tiene hijos en el districto de Lamont, estoy interesada sobre los pesticidas. Cuando mi primer hijo comenso a sistir la escula de Mt. View todo iba bien casi cuando completaba el año comenso con unos dolores de cabeza y mareos pense que fue porque es parte de crecimiento. Lo llevava al medico y me decian ~~con~~ que ~~ado~~ padecia de migranas, y me frustaba de no saber que hacer. Ahora que tengo mas conocimiento sobre los pesticidas, no tengo duda que son la causa de sus sintomas. Hare lo possible por informarme mas y por correr la voz ~~sobre~~ de que deven avizar cuando van a echar veneno serca de las escuelas. Algo mas me hubiera gustado que

SURNAME

To whom it may correspond:

I am a member of the community of Lamont. As a mother, I am concerned about the well-being of my family. I want the best for them regarding health and education. My concern regarding the danger of pesticides is very large. It is a good idea farmers notify schools when a pesticide are going to be used around. I would like to make a suggestion: have a workshop in Bakersfield. I will assure you a lot of people will be interested in attending the meeting. It is an excellent idea to regulate and notify schools when pesticides will be used around them.

Thanks!

Sincerely

Pamela Martinez

4/14
4-13-16

A quien corresponda,

Soy un miembro de la comunidad de Lamont y tengo hijos en el distrito. Como padre me preocupa el bienestar de mis hijos y quiero lo el mejor para mis hijos en salud y educacion. Mi preocupacion sobre el peligro de pesticidas destringidos es muy grande. Si es una buena idea que avisen el ranchero a las escuela de que van a echar pesticidas. Otra cosa que quiciera agregar es de que como devido a una enfermedad no puedo asistir al taller, pero quisiera que hicieran lo posible de tener otro taller mas cercano a Bakersfield. Le aseguro que padres estarian dispuestos a asistir. Por favor aguan lo posible de regular el aviso a las escuelas. Gracias.

Atentamente
Pamela Martinez

SURNAME

California Department of Pesticide Regulation
Workshops for Fumigation Notification
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Talleres para Notificación de Fumigaciones
Abril 12 – 14 de 2016

Name
Nombre

Organization
Organización

Please write your comments here if you prefer to submit them in writing, or have them read for you.
Por favor, escriba sus comentarios aquí si prefiere someterlos por escrito, o que sean leídos para usted.

Yo como campesino que vivo cerca de una lecheria
Quiero informasion de cuando fumiga con el abion porque
fumigan cerca de la casa donde yo rento ya mi no
Me informan nada aserca de los que fumigan y tambien
deben de [redacted] abisarnos 2 semanas antes o una semana
antes y porfabor

I am a farmer who lives near a dairy farm.
I want to be notified when the aerial fumigation
taking place near my home. I rent a home near
the dairy farm, and I am not notified of the
fumigation dates. I also recommend to be notified
2 weeks prior to fumigation.

California Department of Pesticide Regulation
Workshops for Fumigation Notification
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Departamento de Reglamentación de Pesticidas de California
Talleres para Notificación de Fumigaciones
Abril 12 – 14 de 2016

Name / Nombre: Raquel Sanchez De Tulare CA 93274

Organization / Organización: Quinto Sol De America

Please write your comments here if you prefer to submit them in writing, or have them read for you.
Por favor, escriba sus comentarios aquí si prefiere someterlos por escrito, o que sean leídos para usted.

Queremos que se notifique sobre los ispecticidas en las escuelas y en la poblacion es y se nos notifique de 1 A dos Semanas antes para cuando ban a fumigar y Tambien en las escuelas nosotros queremos que las notificasiones sean mas grandes y mas visibles

Raquel Sanchez
Tulare California 93274
Organization: Quinto Sol
De America

We want schools and residential areas to be notified before pesticides are used in the field. One week in advance, the notifications should be large, visible, and known by the entire community.

SURNAME

Abril 13, 2016

My name is Juana Mariscal.
I am a member of the Lamont community.
As a mother of two, I am concerned regarding the danger of pesticides. I would like to tell my personal experience with reference to my eldest son. My son was attending Mt. View elementary school. Shortly after, he started having headaches constantly. Then, he had to stop doing extra-curricular activities at school because of the headaches. My son was diagnosed with migraines by his pediatrician. Later, I formed part of a group of parents. Somebody came to our group to talk about pesticides. After this, I concluded that my son's symptoms were caused by pesticides. I agree that farmers notify schools when pesticides will be used around them. If possible, do not spray during the week, only during weekends. Why don't you bring your workshop closer to our towns?
Thank you, and I wish you can make considerable efforts in changing the situation. But don't forget about us!

Juana Mariscal

4/14

Abril 13, 20

Mi nombre es Juana Mariscal
yo como miembro de la comunidad
de Lamont y como madre de dos
hijos me preocupa y me intersa el
peligro de los pesticidas, quiero contar
mi experiencia sobre mi hijo mayor, el
hacistio a la escuela Mt. view y poco
tiempo despues comenzo con dolor
de cabeza y ya no pudo continuar
actividades que el queria despues
de la escuela por causa del dolor.
o llevava al pedriata y le
diagnosticaron migrañas. Trempo
espucs forme parte de
in grupo de padres y fue una persona
a darnos informacion sobre los pesticidas
de ahi condui que los simtomas
de mi hijo fueron por pesticidas.
i estay de acuerdo que los grangeros
avisen a las escuelas cuando van
echar pesticidas si es posible
de que no echen entre semana solo
fin de semana mejor, otro comentario
es de que si es posible de tener
las talleres o juntas serca de nuestra

SURNAME