



March 29, 2017

Turtle Island Restoration Network  
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Linda Irokawa-Otani, Regulations Coordinator  
Brian Leahy, Director  
Department of Pesticide Regulation (DPR)  
P.O. Box 4015  
Sacramento, CA 95812-4015

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RE: Revisions to the draft regulations for pesticide use near schools

Dear Director Leahy and Coordinator Irokawa-Otani:

These comments are submitted on behalf of Turtle Island Restoration Network, which has over 15,000 active supporters in California. As an environmental conservation organization, we are concerned about the impacts of pesticide use to the natural environment and to human beings. We are extremely disappointed that DPR's proposed revisions to the draft regulations for pesticide use near schools and daycares not only significantly weaken them but also fail to address the shortcomings of the original draft.

As amended, the regulations still do not adequately protect school children or staff from the health threats of highly hazardous, drift-prone pesticide applications. The proposed quarter-mile, part-time buffer zones are an improvement for many counties, but do not address the serious health threat posed by chronic exposure. A large and growing body of scientific evidence supports the need for a full-time, one-mile buffer zone in order to protect children from both chronic and acute exposures, and the vast majority of public comments received by DPR echoed this demand.

At the very least, **DPR should extend the buffer zone period to include times "when children are present" on school property**, as is the current permit condition language in numerous counties, including Kern, Imperial, San Luis Obispo,

Sutter, and Santa Barbara Counties. The proposed buffer zones, from 6 a.m. to 6 p.m. on school days, fail to address the potential for exposure during after-school and weekend events and activities, as well as in the early morning hours when childcare centers are open.

We are dismayed that you have removed the 48-hour notification requirement from the draft regulations. All students, parents, teachers and administrators have the right to know when drift-prone toxic pesticides are in use nearby so that they can take appropriate steps to prevent exposure, but such information is extremely difficult to find. You note that you will revisit the notification requirement once the pilot programs in Kern and Monterey Counties are complete, but fail to note that at least one county, Santa Cruz, has for years successfully provided five-day notice to schools in advance of fumigant applications – surely a model that could be replicated. At a minimum, **DPR must require County Agricultural Commissioners to post 48-hour notice on their websites of planned applications of restricted materials within the school buffer zone**, so that concerned community members can access what is at present essentially secret information.

Finally, we ask that **DPR extend its proposed ban on fumigant applications within the school buffer zone for 36 hours before school is in session to include organophosphate pesticides**, a class of chemicals that is linked to severe neurological and respiratory damage.

Sincerely,

A handwritten signature in black ink that reads "Cassie Burdyshaw". The signature is written in a cursive, flowing style.

Cassie Burdyshaw  
Advocacy & Policy Director  
Turtle Island Restoration Network