Brian Leahy, Director and Randy Segawa, Program Manager
Department of Pesticide Regulation (DPR)
P.O. Box 4015
Sacramento, CA 95812-4015

Re: Comprehensive Right to Know regarding Fumigation Notification

Dear Director Leahy and Mr. Segawa:

I submit the following public comments in favor of a comprehensive right to know regarding Fumigant Notification in California:

Written, bilingual notification is needed at least one week in advance of specific fumigations for all places where people live, work, study and play within 1 mile from the applied fields.

- Notification should be provided to all **residences, schools, day care centers, other institutions and businesses, including other farms, within one mile** of planned field fumigation because past drift incidents have affected people up to a mile from fumigated fields.

- A 1 mile area for notice is needed to allow early detection of drift problems, because there have been incidents where fumigant drift over 1 mile has caused illnesses. The only comprehensive academic study of pesticide drift incidents found that 85% of the harmed victims were within one mile of the application site.

- Written bilingual notification should be provided **at least one week before a scheduled fumigation** either by mail or hand delivery to residences including labor camps, schools, day care centers, other institutions and businesses within the notification area. Follow-up notice should be provided 48 hours before fumigation and re-noticed if the fumigation is delayed more than 12 hours.

- A brief notification update should be sent out when renotification is sent to the Agricultural Commissioner.

- Notification should be automatic rather than follow the methyl bromide regulation model where residents get a pre-notice early in the season and then have to have to request fumigation notification.

- Residents and businesses should be given the option to sign up for supplemental notification by email or robo-call for any future fumigation notices.

- Notification should be maintained as a separate right to know requirement rather than combined with emergency response requirements on the label because people need to be informed of both possible immediate and chronic health risks.

- Written notification in English and Spanish should include
  - a graphic showing a tarped field posted with the skull and crossbones sign,
  - the name(s) of fumigant(s) to be used,
  - date and time fumigation is expected to begin
  - immediate symptoms of exposure and chronic health risks, including any listing in California as a cancer causing chemical or reproductive toxin and website address for label and Safety Data Sheet.
  - farm name and business phone and address of field to be fumigated and a map of immediate area around the field showing the nearest roads
  - contact number for the county agricultural commissioner and instructions on where to call nights and weekends to report fumigation problems
  - explanation of the state's pesticide drift emergency medical reimbursement process with website address for more information

Thank you for your commitment to a fair and safe fumigant notification process.

Sincerely, Jasmine A. Garcia