

Association of Irrigated Residents  
29389 Fresno Ave  
Shafter, CA 93263

July 27, 2015

Department of Pesticide Regulation

Dear Director Leahy and Chief Farnsworth,

We welcome DPR's attention to the problem of pesticide use near schools because as an organization, we have serious concerns about heavy agricultural pesticide use near local schools. Some members of the Association of Irrigated Residents (AIR) either work at schools or have children that attend schools which are located within a mile of agricultural fields which are sprayed regularly. While at these schools they have experienced strong smells associated with chemical spraying of crops. During the winter, dormant spraying of orchards can leave pesticide smells lingering in the air for many hours, especially on days when we have the notorious valley fog and there is no dispersal of the air. Headaches from these smells are common and the dangers of continued exposure over many years is a threat everyone at these schools. By 2016, DPR should move swiftly to adopt new protections for schoolchildren from hazardous and volatile pesticides and find new ways to promote and support sustainable, cutting-edge agriculture.

The Association of Irrigated Residents is an environmental justice group focusing on air and water quality issues in the San Joaquin Valley. Members reside in Kern, Tulare, Kings, Fresno, and Stanislaus Counties.

We are particularly concerned about the disproportionate exposure of Latino schoolchildren, a fact documented by the Department of Public Health (DPH) report released last year. Latino children are almost twice as likely as white children to attend schools near the heaviest agricultural pesticide use. This is a civil rights violation that DPR must rectify by decreasing the risk of pesticide exposure at schools across the state. The DPH report also found soil fumigants and other pesticides which are known to cause cancer, reproductive system effects, harm to the brain and nervous system and respiratory effects being used in large quantities within ¼ mile of many California schools.

DPR should require one-mile protection zones (buffer zones) between fields where pesticides of public health concern are used and schools, childcare centers, school bus stops, and known school routes. Pesticides of public health concern include pesticides that show evidence of causing cancer, reproductive damage, harm to the brain and nervous system, and asthma and other respiratory problems. Protection zones of ¼ mile currently required in some counties are simply not adequate for health protection. The UC Davis MIND Institute recently showed that mothers who lived within a mile of fields where chlorpyrifos and other pesticides were sprayed while pregnant show a 60% higher chance of having children with autism. The DPH report documented that chlorpyrifos was the 8<sup>th</sup> most common pesticide used within ¼ mile of schools in 2010.

Second, no-spray protection zones around schools should be enforced at all times for ground, air blast, as well as for aircraft applications, because students, teachers and community members are often on school grounds for scheduled events and unscheduled

activities when school is not formally in session. Furthermore, pesticides can evaporate off the crop plants for an extended period after they are applied and pesticide contaminated dust can be blown onto school grounds and tracked into classrooms.

Third, once the new no-spray protection zones are in place, DPR should conduct ongoing air monitoring at half a dozen schools around the state that have been identified as having the most pesticides of public health concern applied nearby. Any exceedances of health screening levels detected by air monitors should be immediately reported to local school and county officials, parents and teachers and should trigger an expansion of the protection zone.

Fourth, while large, one-mile buffer zones are essential for reducing exposure and protecting children's health, if any pesticide use continues to be allowed within 1 mile of schools, advance notification should be provided to the schools. Schools should then be required to notify teachers and use the robo-call systems to notify parents.

Finally, while these are important first steps, your department needs to devote significant resources and attention, in collaboration with other agencies and universities, to reducing the use of and phasing out the use of soil fumigants and other high toxicity, drift-prone pesticides and helping farmers obtain resources to assist with this transition. Through innovation in agriculture, we can help California farmers adopt cutting-edge practices and tools that keep agriculture prosperous.

Thank you for your commitment to the state's children and to the success of our farmers.

Sincerely,

Tom Frantz, President  
Association of Irrigated Residents