

From: [Brian Oakey](#)
To: [Janis Perry](#)
Subject: FW: {External}I support health & safety standards for pesticide use
Date: Monday, July 20, 2020 1:16:39 PM

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From: Sue Skinner <suebaru80@gmail.com>
Sent: Monday, July 20, 2020 11:41 AM
To: Brian Oakey <Brian.Oakey@ISDA.IDAHO.GOV>
Subject: {External}I support health & safety standards for pesticide use

Sue Skinner
PO Box 4024
Pocatello, ID 83205

Dear Mr Oakey,

I am writing to you today on behalf of myself and my community. I am concerned about the impact of the proposed rules regarding pesticide regulations in the State of Idaho. The proposed rules are a threat to public health and the safety of the workers who provide our community with food. Specifically, I am most concerned with the following:

KEEP THE EXISTING AERIAL APPLICATION RULES

-I advocate for Low Flying Prohibitions - Under the Federal Aviation Administration (FAA) — which ISDA is deferring to — a person living in an area would not receive notification of potentially dangerous low-flying aircraft unless they lived in a congested area. This is problematic because it interferes with the peaceful use and enjoyment of one's property, and can lead to unsafe conditions due to accidental chemical exposure or mechanical failure of low flying crop dusters.

I advocate for Increased Protection of Hazard Areas - We advocate for the buffer zone around hazard areas — which include cities, towns, schools and hospitals — to be increased from one half mile to one mile when applying pesticides by plane unless the wind is blowing away from the area. This buffer zone for hazard areas is important to protecting the health and safety of people who live, work, and play in our rural communities. The proposed rule removes any buffer all together.

I advocate for Accessible Noticing of Pesticide Applications- Under the Federal Aviation Administration (FAA) notification of aerial application is not required in uncongested areas. ISDA should retain the rule requiring noticing for all residents when aerial applications of pesticides are being done in their area and expand it to include accessibility for both English and Spanish speakers to ensure the greatest number of Idahoans are in the know. Protection of human health is a stated objective of ISDA.

I advocate for Guidance on Wind Speed for Applicators to Prevent Pesticide Drift- Rules preventing pesticides from being applied when wind speeds are over 10 mph are being removed. This removes important guidance for applicators and could open the door for more drift to occur. Removing Idaho specific wind speed restrictions does not uphold public health or promote safe pesticide management.

Allowing one bad apple to influence the proposed changes in rules for aerial applicators through our legislature shows that Idaho Aerial Applicators cannot police their own. It is more appropriate for Idaho Aerial Applicators to step up to police their own to ensure public health and safety is met. The current ISDA rules are based upon unique Idaho, local understanding from past incidents. To make them less stringent now would defer to Federal rules that do not take this Idaho local understanding into consideration. Because of our unique Idaho agricultural considerations and past lessons, it is appropriate to keep the aerial applicator rules as is.

Direct Supervision must be required for the Commercial Applicator Apprentice program. ISDA certainly knows that the 2 deaths in Idaho from Magnicide application were serious events that must not be loosened under the guise of reducing rules and regulations. These apprenticeships shall not be allowed to apply Restricted Use Pesticides.

I advocate for New Pesticide Applicators to have Onsite Supervision- More people will be able to spray more pesticides with minimal training and supervision with the proposed new Commercial Apprenticeship (CA) pesticide application license. As proposed the new Commercial Apprenticeship (CA) category creates a stepping stone for people new to applying pesticides commercially. We support on the job training, but believe for it to be effective and to ensure public safety, on site supervision should be required not remote supervision and that they should not be applying restricted use pesticides.

I advocate for Increased Involvement of State Agencies to Protect Water Quality: 95% of Idaho ground water is drinking water and we need to protect water quality! The lack of involvement of important stakeholders like the Idaho Department of Environmental Quality (IDEQ) is concerning. We need to prevent the siphoning of pesticides and chemicals into groundwater. Idaho has too many measurable amounts of pesticides and nitrates in groundwater to be sustainable over time. Cross program coordination, advocacy, education, transparency and prevention is the only way to protect the most precious resource to Idahoans, drinking water.

ISDA has the difficult job of both advocating agriculture and protecting people in agriculture. Our dedicated Latino Idaho workers deserve bilingual warning signs on pesticide use, storage, and chemigation. It is time for Idaho to step up to the responsibilities our State needs, especially with the population growth and care needed.

Please uphold the standards the previous rules enforced and allow for stronger protections for our communities. Thank you for your time.

Signed,
Sue Skinner

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