

From: [Susan Deemer](#)
To: [Brian Oakey](#)
Subject: {External}Pesticide limits make sense
Date: Thursday, July 16, 2020 8:28:19 PM

Dear Deputy Director Brian Oakey,

The Pesticide Rules proposed by the Idaho State Department of Agriculture do not go far enough to ensure proper notification of sensitive populations, and protections to limit the drift of pesticides.

In addition, I am concerned about the Apprentice License, which would reduce oversight and protections for Idaho's environment, the safety of workers, and public health. Instead, I encourage you to identify ways that apprentices can monitor and assist with pesticide application under direct control and supervision of licensed applicators.

The ISDA must also ensure compliance with the terms of Idaho Code 22-101A, which requires assessment of the public health impacts of any rules. Such an analysis should be required in the context of this rulemaking, and should delineate how public health will be impacted as a result of the removal of these sections.

Finally, the definition of Hazard Area should be expanded to include schools, hospitals, community-living complex or any other inhabited area.

Regards,
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