

From: [Martin Godina](#)
To: [Brian Oakey](#)
Subject: {External}Please protect schools and hospitals
Date: Thursday, August 6, 2020 1:28:22 PM

Dear Deputy Director Brian Oakey,

Thank you for restoring the prohibition on aerial spraying when winds exceed 10 mph. While this is a step in the right direction, the revised Pesticide Rules proposed by the Idaho State Department of Agriculture still do not go far enough to ensure proper notification of sensitive populations, and protections to limit the drift of pesticides.

As President Thomas Jefferson said, government closest to the people serves the people best. Instead, ISDA is proposing to eliminate protections and defer to federal regulators who have been non-responsive and lack the capacity to monitor and enforce protections for Idaho communities.

The definition of Hazard Area should be expanded to include schools, hospitals, community-living complex or any other inhabited structure, and aerial spraying should be prohibited within 1/2 mile unless the wind is blowing away from the Hazard Area.

In addition, I request that the ISDA extend the 6-day comment period to ensure that Idahoans have the opportunity to weigh in on this important program.

Regards,
Martin Godina
13182 W Scotfield St
Boise, ID 83713

From: [Martin Godina](#)
To: [Brian Oakey](#)
Subject: {External}Restore public health protections - Pesticide Rules
Date: Thursday, August 6, 2020 1:24:38 PM

Dear Deputy Director Brian Oakey,

Thank you for restoring some of the protections for public health that were removed from the proposed Pesticide Rules. While this is encouraging, I remain concerned about the lack of protections for some of Idaho's most sensitive populations.

In particular, I am concerned about the removal of protections for schools and hospitals. The ISDA stated that "Schools, hospitals... are contained in cities, towns, or settlements." In fact, many schools and hospitals are located outside of congested areas. Further, prior rules ensured that Hospitals and Schools were notified, and approved of the spraying. There is no comparable requirement in FAA Regulations.

Instead, in order to protect the health of Idaho's most at-risk populations, I urge you to add schools, hospitals and community-living complexes to the definition of Hazard Areas, AND to restore the prohibitions on applying pesticides within 1/2 mile of Hazard Areas unless the wind is blowing away from the area.

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

Making these changes will better protect public health, students, elderly and other sensitive populations, while providing accountability and direction to applicators.

Finally, I encourage you to consider extending the comment period. Especially since there are so many unanswered questions re: the FAA and their oversight, a 6 day comment period is hardly sufficient.

Regards,
Martin Godina
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