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From: Casey O'Leary <greenshera@hotmail.com> Date: September 26, 2020 at 9:15:30 AM MDT To: Brian Oakey <Brian.Oakey@ISDA.IDAHO.GOV> Subject: {External}Do not further weaken Idaho's pesticide application standards. Reply-To: Casey O'Leary <greenshera@hotmail.com>

Casey O'Leary 2609 N Arthur St Boise, ID 83703

Dear Mr. Oakey,

I am a farmer in Ada County and I am writing to you today on behalf of myself, my industry, and my community. I am concerned about the impact of the proposed rule changes regarding pesticide application regulations in the State of Idaho. The proposed rules do not adequately protect public health and the safety of the agricultural workers who are often some of the most vulnerable members of our community. Further, stories like the one that happened last May where 12 farmworkers were sickened by pesticide exposure and sent to the hospital erode the public's trust in our ability as farmers to be helpful and beneficial parts of our economy and community.

Farmers need MORE assistance with understanding the best and safest ways to avoid sickening workers and doing harm to the environment, not less. By reducing regulations on when, what, and how farmers can spray their fields, you put them in a situation where they are not using the best possible science and safety practices that will protect workers and the environment, and when tragedies happen, the public will blame them, not you.

Do the job the public has entrusted to you and provide clear safety standards and ample education so that farmers and aerial sprayers can avoid doing harm and eroding the public's trust in our industry.

Specifically, I am requesting the following changes to the proposed rules:

Expressly include protections for schools, hospitals, towns, and cities from pesticides linked to neurological and developmental diseases, cancer and early

death. The most notable being the class of organophosphate pesticides and paraquat.

Currently the only express protections for hazard areas mentioned is for Phenoxy Herbicide, but these pesticides (Dicamba and 24-D) are only classified as probable carcinogen, while organophosphates and paraquat have known links to cancer, developmental issues in children, and death.

In addition to the language changes in the rule I support:

Please create opportunities for farm workers and labor advocates to have a seat at the table and be consulted during department decision making that impacts them and to reduce their exposure to pesticides in the workplace.

Increase education and compliance assistance for employers about their responsibility and requirement to provide annual pesticide training to their employees.

Continue to investigate all reported pesticide incidents, including those involving aerial applications.

Insure pesticide incident reporting is language accessible in at least English and Spanish by phone and online form via ISDA.

Because noticing requirements for aerial applications have been removed from state law, please continue to take steps to reduce the risk of pesticide exposure.

Please uphold the standards the previous rules enforced and allow for stronger protections for our communities and the livelihood of Idaho farmers like myself. Thank you for your time and the opportunity to participate in this process.

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