

**From:** [Brian Oakey](#)  
**To:** [Janis Perry](#)  
**Subject:** FW: {External}Protect Idahoans from pesticides  
**Date:** Tuesday, October 6, 2020 2:17:54 PM

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**From:** Betty Grover <Betty.Grover.378234580@p2a.co>  
**Sent:** Tuesday, October 6, 2020 2:17 PM  
**To:** Brian Oakey <Brian.Oakey@ISDA.IDAHO.GOV>  
**Subject:** {External}Protect Idahoans from pesticides

Dear Deputy Director Brian Oakey,

Thank you for including a prohibition on pesticide application when wind speeds exceed 10 mph, and for providing clear direction and prohibition on pesticide drift.

While I support these changes, I also urge the ISDA to expand the definition for 'hazard areas' to ensure that public health is protected from the most toxic pesticides. Schools, hospitals and other sensitive areas should receive special protections because of the risk to sensitive populations of children, elderly and individuals with underlying conditions.

In particular, if the rationale for inclusion of phenoxy (dicamba and 2-4D) herbicides is to protect public and environmental health, other carcinogenic and toxic pesticides (including organophosphate pesticides and paraquat) should similarly be included. Both paraquat and organophosphates pose higher relative risk to sensitive populations.

Currently the only protections for hazard areas mentioned is for phenoxy herbicides, but these pesticides (Dicamba and 2,4-D) are only classified as 'probable carcinogens', while organophosphates and paraquat have known links to cancer, developmental issues in children, and death.

Paraquat is the most acutely lethal herbicide in common usage, and has been linked to the deaths of at least 30 people in the U.S. in recent decades. In addition, chronic paraquat exposure has been associated with an increased risk of developing Parkinson's disease.

It's also important that these rules adequately protect farmworkers. Because farmworkers may be unlikely to report symptoms, lack an understanding about pesticide poisoning symptoms, lack access to health care and/or not have information on the pesticide products used at their workplace, it is critical to include proper noticing, education and monitoring and enforcement provisions in these rules.

Increased education and compliance assistance should be included for employers, including mandatory pesticide training for their employees.

Further, pesticide education, monitoring and incident reporting should be accessible in at least English and Spanish, and should be accepted online or via a phone hotline at ISDA.

Regards,  
Betty Grover  
536 Richland Ave  
Pocatello, ID 83201 ||

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