

From: [Brian Oakey](#)
To: [Janis Perry](#)
Subject: FW: {External}Pesticide rules should be more protective
Date: Wednesday, September 30, 2020 4:28:16 PM

From: Mark Morehead <Mark.Morehead.281585137@p2a.co>
Sent: Wednesday, September 30, 2020 4:23 PM
To: Brian Oakey <Brian.Oakey@ISDA.IDAHO.GOV>
Subject: {External}Pesticide rules should be more protective

Dear Deputy Director Brian Oakey,

Thank you for the opportunities to provide comments on the proposed Pesticide Rules.

These rules have the potential to impact public health and should be closely scrutinized to ensure that they are consistent with best available science and should undergo full review consistent with Idaho Code 22-101A.

I do appreciate that ISDA has proposed limitations when wind speeds exceed 10 mph, and for providing a definition and prohibition on pesticide "drift."

Still, I urge the ISDA to expand the definition for 'hazard areas' to ensure that public health is better protected from the most toxic pesticides, especially for sensitive populations who congregate at schools, hospitals and other long-term care facilities.

These sensitive areas should be protected because of the risk to sensitive populations, including 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 more carcinogenic and toxic pesticides should similarly be included. Both paraquat and organophosphates pose higher relative risk to sensitive populations.

I also request that specific provisions be considered to ensure fair and equal access to pesticide information, including education, monitoring, reporting and training materials. These should be provided in English and Spanish, at a minimum.

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 accessibility to noticing, education and monitoring and enforcement provisions through these rules.

Thank you for considering these comments.

Regards,
Mark Morehead
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