



February 28, 2022

Julie Henderson, Director  
California Department of Pesticide Regulation  
Via email: [julie.henderson@cdpr.ca.gov](mailto:julie.henderson@cdpr.ca.gov)

Dear Director Henderson,

We are grateful to the Agricultural Commissioners of Santa Cruz, Ventura, Riverside and Stanislaus Counties for volunteering to participate in pilot pesticide notification programs. However, as more details about the plans for the pilots become known to us, we are increasingly concerned that collectively the pilots will be too similarly structured to enable DPR to test an appropriate range of strategies, and will be highly restricted in terms of to whom and about what notice is given. Specifically, the pilots appear to be limited in geographic scope, will provide notification to too few people and for too few pesticide Active Ingredients, will lack any publicly accessible component, may be inaccessible to Spanish speaking residents, and above all, are so similar to each other that an opportunity to pilot a variety of approaches will be squandered.

**Grayson:**

Despite organizer Bianca Lopez maintaining regular communication with the Stanislaus County Agricultural Commissioner, we learned details of the planned pilot in Grayson from an article in the Modesto Bee, in which the CAC falsely claimed there was no interest or engagement by the community. From what we learned in this article, notification will be limited to a one-mile radius in Grayson, and only those who register for notification will receive information, and - incredibly for a small town that is 96.8% Latinx - will be delivered only in English. The registration requirement directly contradicts the assurance you gave us when we met with you in person on December 23, 2021, that all pilots would include public-facing information that can be accessed via a portal by entering any address, without the need to register.

**Watsonville:**

In a meeting with DPR on February 10 we were informed by Assistant Director for Enforcement Ken Everett that Santa Cruz would be using a pilot designed by DPR. Our understanding of the proposed pilot is that it will be restricted to a small number of fumigations within a one mile radius of a senior housing community in Watsonville, and the information will be limited to residents of the test area who register. Can you confirm that this is indeed the pilot designed by DPR? Please address DPR's decision to curtail the scope of the pilot so drastically as compared to the pilot designed by DPR for the town of Shafter, which would have provided publicly webposted NOIs for applications of four fumigant pesticides within a seven mile radius.

**Nyeland Acres:**

Our understanding of the pilot proposed for Nyeland Acres is that it will also be limited to push-notifications via text and email for residents of a one-mile radius, with no publicly accessible component.

**Eastern Coachella:**

We have received no information about what is proposed in the Riverside County pilot. Please provide details as they become available.

**Shafter:**

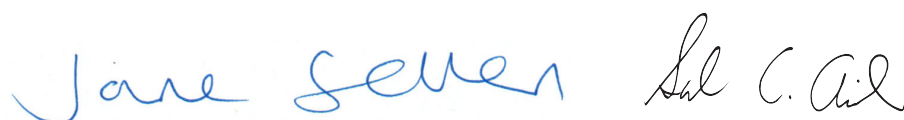
The pilot proposed by DPR for the town of Shafter would have made all NOIs for four fumigants within a seven mile radius fully public via a public-facing DPR webpage. Although limited in terms of the pesticides for which notice would be offered, the proposed Shafter pilot was far more expansive than any of the currently proposed pilots in terms of geographic scope and accessibility of information.

We urge you to take steps now to establish the following as a floor for each piloted program:

- The proposed pilots must differ substantially from each other in order to test a variety of approaches for the statewide program
- Pesticide information must be fully public, with no registration requirement
- Information must be made available in appropriate languages, with English and Spanish being the bare minimum
- The geographic range should match or exceed what was proposed for Shafter
- Notification should be given for all Restricted Material pesticides, at a minimum.

We look forward to learning additional details about the proposed pilots and the public workshops as they become available.

Sincerely,



Jane Sellen and Sarah Aird, Co-Directors