



July 15, 2022

Department of Pesticide Regulation
Via email: ProjectNotify@cdpr.ca.gov

RE: Statewide Pesticide Notification System

Dear Department of Pesticide Regulation:

We are writing to express how critical it is that DPR arrange in-person workshops on DPR's draft notification system.

While we appreciate improvements made to the June virtual notification workshops, in comparison with the notification webinars held in the fall of last year, ultimately the virtual format ended up being inadequate for meeting Environmental Justice principles of meaningful engagement, full transparency and accountability.

We urge DPR to hold at least five in-person workshops to hear from community members in the four pilot regions as well as an additional workshop in the southern San Joaquin Valley, where agricultural pesticides are most heavily used. More details on our recommendations are below, but first we would like to outline why the virtual workshops were insufficient for gathering full public input.

Inadequacy of Virtual Workshops:

- Many community members are unable to participate in virtual workshops due to **lack of access to technology** (lack of a computer, lack of wifi, lack of knowledge on how to access virtual workshops via Zoom or other software platforms).

- In recognition of this technology challenge, we organized a series of watch parties where people could come together to participate via Zoom. DPR was aware of these watch parties yet because of the virtual format, it was not necessarily evident to anyone not in the watch party rooms how many people were ready and wanting to give public comment; altogether **we're aware of at least 75 people who were ready but who were not able to give public comment during the virtual workshops**, including:

- Approximately 20 people from Tulare County
- Approximately 15 people from Kern County

- Approximately 20 people from Monterey County (primarily from the predominantly Spanish-language community of Greenfield)
- Approximately 9 people from Fresno County
- Approximately 9 people from Ventura County

Most of these community members attended the third workshop, and in frustration, protested being excluded from the conversation. It was not feasible for individuals at the watch parties to testify via chat.

- **Not enough time was set aside for public comment** (this is an issue to consider for in-person workshops as well). The virtual workshops were two hours, with an important initial presentation; however, a lot of time was then spent in the breakout rooms reviewing the various design elements about which DPR wanted feedback and then later on giving summaries of people's comments from the different breakout rooms. This left only about 40 minutes of a 2-hour meeting for people to give their public comments.

- **The breakout rooms, and any division like this by language, were problematic, with community members feeling like they were being treated as "separate but equal" based on language and race.** Many of the growers were in the English-language breakout rooms while many of the participating farmworkers and community members were in the Spanish-language rooms. This inhibited dialogue and understanding. Summaries of people's comments are always going to be imperfect and are not the same as ensuring that everyone in attendance who cares about this issue is able to speak to the entire room and is able to hear exactly what everyone else has to say.

- We appreciate the need to hold workshops at different times that make it more likely that a variety of stakeholders will be able to participate, but **only the Wednesday night workshop was held at a time that was workable for most community members.** Future workshops should include more workshops in the late afternoon/early evening or on Saturday mornings/early afternoons, and with plenty of advance notice.

Need for In-Person Workshops, with Virtual Option:

- **In-person workshops are essential, and each of them should include a virtual option** as well. This hybrid approach has been effectively and widely used at all levels of local and state government over the past couple of years.

- **We request five in-person workshops in total:** one in each of the pilot communities, as well as one in the southern San Joaquin Valley (Kern, Tulare or Fresno). Hosting events in the pilot communities will allow local community members the opportunity to share their experience of the different strategies being piloted. Omitting the southern SJV, where the greatest pesticide use occurs, would be an injustice.

- We understand that time limits for individual comments may be needed but **ask that DPR staff stay at each workshop until each person in attendance** (whether in person or virtually) **has had an opportunity to speak.**

- **Selected venues must be reachable by public transit and centrally-located.** We are knowledgeable about local conditions and are happy to identify local venues that we know are widely accessible.

- **Workshops should be conducted at least in English, Spanish, and relevant Mexican indigenous languages.** We are happy to help identify the most frequently spoken languages in each region and can also help DPR connect with certified interpreters in some counties.

- **Each workshop should be a public event open to all, where everyone is in the same room and can hear each other speak.** We strongly oppose separate meetings for growers, community members, etc. Each workshop should be designed so that every person who attends and wants to speak has a chance to speak, is heard by everyone in the room, has their voice and concerns counted and their questions responded to.

- **Workshops should be held at times that are the most likely to ensure the greatest public turnout** - usually early evenings during the week or mornings/early afternoons on Saturdays, with plenty of advance notice, ideally 45-day notice.

- **Workshops should be recorded and transcripts provided,** along the lines of what agencies such as the California Air Resources Board do.

Thank you for considering our concerns and our call for in-person workshops,

Handwritten signatures of Jane Sellen and Angel Garcia in blue ink.

Jane Sellen and Angel Garcia
Co-Directors
Californians for Pesticide Reform