

California Agricultural Commissioners and Sealers Association



February 1, 2013

CalEnviroScreen
c/o John Faust Chief, Community Assessment & Research Section
Office of Environmental Health Hazard Assessment
1515 Clay Street, Suite 1600
Oakland, CA 94612
Tel: (510) 622-3185

Dear Mr. Faust:

California Agricultural Commissioners (CAC) work closely with the California Department of Pesticide Regulation (DPR), and serve as the primary enforcement agents for State pesticide laws and regulations. Collectively, the CACs work with DPR on pesticide issues of statewide importance through the California Agricultural Commissioners and Sealers Association (CACASA).

This letter is to provide comments regarding the second public review draft of the CalEnviroScreen (CES). CACASA supports the use of sound science in the development of any and all tools used for the protection of all California communities. Towards this end, we seek to offer our comments in the spirit of supporting sound science.

The Office of Environmental Health Hazard Assessment (OEHHA) suggests that no data exists documenting "actual" pesticide exposures. However, the pesticide illness reporting and investigative work performed by CACs and DPR does exist and is the most comprehensive in the nation. We believe that these data should not be ignored, but instead should be reviewed, analyzed and appropriately weighed for inclusion in CES.

DPR has conducted significant air monitoring for pesticides in and around several California communities like Parlier, Salinas, Shafter, and Ripon. These air monitoring data are valuable and provide a true picture of the movement of pesticides in and around California communities. The CES should incorporate use of these air monitoring data and highlight the results.

The OEHHA suggests there may be unintended environmental damage from the use of pesticides and these risks may increase in areas with greater use. Instead of suggesting there "may" be unintended environmental damage from the use of pesticides and "may" increase in areas with greater use, the CES should utilize scientific data that identifies which pesticides are causing actual environmental damage and where this damage is occurring. Similarly, the CES should not merely suggest that this damage "may" increase in areas with greater use. The CES should identify where exactly this is occurring and which specific

Louie Mendoza Jr., President
Yuba County
Agricultural Commissioner /
Sealer of Weights & Measures

Stacy Carlsen, President-elect
Marin County
Agricultural Commissioner /
Sealer of Weights & Measures

Jim Allan, Vice President
(Agriculture)
Solano County
Agricultural Commissioner /
Sealer of Weights & Measures

Kurt Floren, Vice President
(Weights & Measures)
Los Angeles County
Agricultural Commissioner /
Sealer of Weights & Measures

John Gardner, Executive Secretary
San Bernardino County
Agricultural Commissioner /
Sealer of Weights & Measures

Tim Cansler, Executive Director
777 E. Rialto Avenue
San Bernardino, CA 92415-0720
(916) 880-3550
Fax (888) 252-5560
tcansler@cacasa.org

pesticides and practices are the cause. Where is the data and how does this ensure CES is utilizing sound science? To not identify which pesticides and practices are resulting in unintended environmental damage and to suggest this is increasingly occurring in areas of greater use is a disservice to all. We are concerned about the unintended consequences of creating undue fear and distrust in the federal, state and local laws, regulations, policies, and practices intended to protect all California communities. Sound science does not merely suggest what “may” be happening and assert that policy should now result. Sound science hypothesizes what forces may be at work, and identifies where there is need for additional scientific studies in the absence of existing scientific data.

CACs collect extensive pesticide use data that includes not only the date of an application, but also the completion time. The CES does not consider time specific application information. Time specific application is valuable in pin pointing when there exists the greatest chance of exposure. This information can be used to conduct scientific studies targeting the time when if there is pesticide movement off site that movement can be best identified.

The CES cites studies indicating proximity to agricultural pesticide applications increase in-home pesticide concentrations. In actuality, the existing studies do NOT indicate pathways for materials entering the home (e.g. on work clothes/shoes brought in, in home use, etc.). Proximity was NOT the focus of the study. It was a study of a cohort of pregnant women that sought medical care through public health care systems. As a result, the study population includes many farm workers and many other individuals who lived in the production area of the Salinas Valley.

The CES suggests, "An examination of national pesticide illness data concluded that agricultural workers and residents near agriculture had the highest rate of pesticide poisoning from drift incidents". Pesticide drift can be a significant concern, but is a much different situation than merely living in a zip code where applications have occurred. The CES infers that proximity to pesticide use equals exposure. The CES also uses a large area (zip code) to capture a large area of pesticide use to then asserts or infer exposure.

We bring these issues to your attention with the hope that you are interested in the very accurate data we have collected over the years. We also stand ready to assist you in studying the data and analyzing this valuable information and to use the best science available in the development of any and all tools for the protection of all California communities.

Sincerely,

A handwritten signature in blue ink that reads "Louie Mendoza". The signature is cursive and stylized.

Louie Mendoza, President
California Agricultural Commissioners and Sealers Association