

From: Karen Lewotsky karenl@oeconline.org
Subject: Re: Feedback requested by March 16: suggestions of mitigation measures
Date: March 22, 2020 at 1:49 PM
To: Stephanie A Page spage@oda.state.or.us



Greetings, Stephanie and Rose.

I understand that chlorpyrifos is still legal for use in Oregon, and that it is not the role of this work group to ban or otherwise eliminate its use but rather to mitigate its harmful impacts -- I would argue mitigating them to the fullest extent possible is truly our responsibility. My goal in participating in the chlorpyrifos work group is to advocate for measures and mitigations that are as protective as possible of vulnerable and non-target communities as possible.

Given my goal, I support the implementation of all eleven mitigation measures suggested in the *Examples of Mitigation Options* document.

Immediately

- Buffers: Require the adoption and implementation of buffers for bystanders and sensitive areas to be equal to those currently required for application in and around aquatic areas
- RUP designation: Require for all chlorpyrifos products
- REI: Increase the REI to provide maximum protection to workers, equipment operators and others
- PHI: Establish a PHI sufficient to provide maximum protection to workers, equipment operators and others
- Respirators: Update respirator requirements on chlorpyrifos labels as per Oregon OSHA guidance

Within one year

- Prohibited uses: Prohibit use in greenhouses and enclosed structures
- Application methods: Review risks associated with current application methods. Develop and adopt additional restrictions to application methods to address risk of drift and inhalation exposure
- Specialized training: Develop specialized training for certified and licensed applicators and ensure that all applicators go through that training as part of their certification/licensing requirements
- BMPs: Review advisory BMPs and determine if they should be made into mandatory requirements.
- Recordkeeping: Require all applicators to maintain records for all chlorpyrifos application for a period of at least three years, and ensure that such records are available to appropriate state officials

Within four years

- Buffers: Buffers for all areas equal to the court-ordered buffers to protect salmonids should be phased in by no longer than four years (giving two full sessions in which to advocate for legislation to require such buffers).

Thank you for the opportunity to participate in the work group. I look forward to our discussion of mitigations at the next meeting.

Karen

Karen Lewotsky (*she, her*)
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On Wed, Mar 18, 2020 at 11:19 AM Stephanie A Page <spage@oda.state.or.us> wrote:
Dear work group members and interested parties,

We have received a request to extend the comment period on proposed chlorpyrifos mitigation measures. ODA is agreeable to this request, and we want to be flexible during these difficult times. The original deadline of March 16 has now been extended to March 20.

Just a reminder, the possible mitigation measures that ODA provided were only examples of ideas to be discussed rather than proposals. We look forward to your written proposals and the workgroup discussion.

Thanks, Stephanie

On Mar 9, 2020, at 2:09 PM, Stephanie A Page <spage@oda.state.or.us> wrote:

Dear Chlorpyrifos Work Group members and interested parties,

Dear Chlorpyrifos work group members and interested parties,

Attached are two documents to help prepare for the next Work Group meeting on the afternoon of March 30. The document named "ODA Risk Mitigation..." provides an overview of risk mitigation in pesticide labeling, and includes a list of the current mitigation measures in place for Lorsban (chlorpyrifos) to reduce risk of exposure.

The "Examples of Mitigation Options..." document contains examples of mitigation measures (ways to reduce possible risk) that have been previously mentioned, discussed or presented in written comments. *These examples are not meant to be all-inclusive or limiting.* You may have additional ideas and suggestions. Please review these previously discussed ideas and/or provide any others you may have, and **submit your suggestions to ODA by March 16, 2020**. Suggestions will be discussed at the next work group meeting on March 30, 2020.

Please note that our meeting location on March 30 will be at the Chemeketa Center for Business and Industry, and we'll be sending out an agenda and background materials prior to the meeting.

Thanks everyone,

Stephanie Page, REHS
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<ODA Risk Mitigation 2 14 2020 Semi-Final.pdf>
<Examples of Mitigation Options 3 2 2020.pdf>

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