Society of Municipal Arborists

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Diane Manning, Docket Office Manager Div. of Standards Development & Technology Transfer NIOSH 4676 Columbia Parkway C-14 Cincinnati, OH 45226

RE: Request for existing information relevant to implementing the Workers' Family Protection Act

Dear Ms. Manning:

Members of the Arboriculture industry deal with the care of trees and plants in the urban environment. Many urban foresters are practicing a Plant Health Care program which focuses on keeping trees healthy and minimizes the need to use chemicals. Because we work in the public urban areas, we do not apply restricted use chemicals and are particularly careful even with application of chemicals that are readily available for homeowner use. Our workers are regulated and protected by the laws concerning pesticides and the Department of Agriculture, the Department of Transportation, and ANSI regulations. I know of no incidents of hazardous chemicals carried home by the worker. It seems unwarranted and unnecessary for another governmental agency to enter the regulatory role when the present agencies are functioning satisfactorily.

Sincerely yours,

Norma Bonham

Member of Society of Municipal Arborists

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