

November 9, 2023

Director Julie Henderson California Department of Pesticide Regulation 1001 | Street Sacramento, CA 95814

Re: Comments on 2024-2028 Strategic Plan

Dear Director Henderson,

We thank you and the Department of Pesticide Regulation (DPR) for your significant investment in developing a sustainable pest management (SPM) *Roadmap* for California and in developing a new strategic plan. On behalf of Community Alliance with Family Farmers (CAFF) and our family-scale farmers working across the state, we respectfully offer feedback on the 2024-2028 draft Strategic Plan.

Overall, we appreciate DPR's stated goal areas and offer some additions or clarification to the subgoals.

CAFF appreciates the efforts to build alignment across state and local agencies and see significant opportunities to build alignment with federal agencies and programs as well, including record multi-year investments in the Natural Resource Conservation Service due to the Inflation Reduction Act (Goal 1.1). We also encourage DPR and the interagency bodies to identify systemic barriers and solutions to SPM implementation, including land tenure and economic pressures.

We greatly support DPR's stated goals (1.4) to invest in greater technical assistance and see appropriate TA as one of the biggest gaps in current adoption of SPM. In particular, we encourage DPR to invest in "grant funding to support projects" that support on-farm implementation of SPM practices and emphasize peer-to-peer (farmer-to-farmer in agriculture) learning. To that end, we would emphasize greater investments in technical assistance over additional certifications (Goal 1.1.). And encourage the department to spend more resources on "organizational efficiency and innovation" with staff spending more time in the field with farmers and pest control advisors to better understand their challenges and get feedback on possible solutions (Goal 4.2).

Thank you for your consideration.

Sincerely,

Paul Towers
Executive Director