

To Karen



1140 Abbott St., Ste. C, Salinas CA 93901  
P.O. Box 1449, Salinas CA 93902-1449  
831-751-3100 www.montereycfb.com

October 30, 2023

California Department of Pesticide Regulation  
Att: Julie Henderson, Director  
P.O. Box 4015  
Sacramento, CA 95812-4015

**RE: Comments on Proposed Draft Strategic Plan 2024-2028**

Dear Ms. Henderson:

Monterey County Farm Bureau represents family farmers and ranchers in the interest of protecting and promoting agriculture throughout our County. Since 1917, Farm Bureau strives to improve the ability of those engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of our local resources.

On behalf of our Board of Directors, we offer the following comments on the proposed Strategic Plan for the Department of Pesticide Regulation (DPR) for the coming four years.

First, we offer our thanks for meeting with growers of the Salinas Valley while attending the Biological Summit in Salinas in late June. The opportunity to discuss several issues facing local farm operations, the pests and diseases encountered in recent years, and the challenges of farm finances and market pressures hopefully provided a sense of how much is at stake for our agricultural community.

Background

Monterey County, and specifically the Salinas Valley, produces fresh food products that are essential to a healthy diet. Our county leads all of California in production of Lettuce, Strawberries, Broccoli, Cauliflower, Mushrooms, Spinach, Artichokes, Cabbage, and Celery. Our growers produce over 60% of leafy greens, 53% of broccoli, and 30% of strawberries that end up on our nation's dinner tables each year. Our fields include one of the largest organic production areas in our country with over 81,000 acres of certified organic production. Our unique confluence of climate, soil, and water make the Salinas Valley the Salad Bowl of the World with exports to 26 countries annually. In 2022, Monterey County farmgate value was \$4.6 billion, ranking our County fourth in crop value production in California.

Statewide, farms are producing the safest food supply for our country's dinner tables each day; food safety has become a primary objective through participation in the Leafy Greens Marketing Agreement. The cost of this food is amongst the lowest in the world, providing domestic food security and reducing the reliance on imported food staples to enhance the supply chain. California's agricultural economy is a significant contributor to the health of our residents as well as providing many jobs for those engaged in the agronomics of food production.

Here in Monterey County, farm operations pride themselves on being early adopters of new farm practices that limit the reliance on natural resources and maintaining soil health for year-over-year production yield increases. Irrigation water use has been reduced by 20% in the past 25 years utilizing new technologies while crop production has increased in value by 45%, coupled with enhanced agronomics and improved breeding research. Local farms already practice sustainable agriculture and are moving into regenerative practices as those become proven and financially viable.

#### Specific comments on elements of the proposed Strategic Plan

- DPR Strategic Goals section states, “Pest management protects public health and the environment and supports a stable, healthy food supply for all Californians.” This statement should also include “affordable food supply” as domestic food production has proven to maintain a food supply chain that is amongst the lowest priced in the world, allowing all levels of income to have access to bountiful fresh food products daily. The goal of any strategic plan, by any governmental agency, should be a food supply that remains affordable for all consumers.
- Goal 1: Increase Access to Safe, Effective, Sustainable Pest Management notes that DPR “must support the accelerated availability and adoption of effective sustainable pest management (SPM) tools, practices, resources and technologies.” What is missing is the extensive and rigorous scientific research that will achieve this goal in an environment where new exotic pests and diseases are inflicting harm to both natural and working environments. While climate change (and other pathways) may be bringing new pests and diseases to California environments, it also will impact the effectiveness of biological solutions; currently, those that are using biological based organisms are finding these solutions work in only narrow conditions with fluctuating results. Even regenerative practices are finding this effort difficult to scale or maintain consistent results. Scientific-based research needs to be fully conclusive on the effectiveness of biological solutions *as the only solution available* before implementation on a broader, statewide scale.
- For Goal 1.1, partnerships and collaborations are necessary to be successful, yes, but only if participants are trained in the science of crop management and pest control; advisory groups that utilize anecdotal experience or conceptual theories about chemical control of pests will not gain traction in the agricultural sector nor provide real world solutions that can be implemented and become successful. Certifications for SPM in agricultural settings would be duplicative of the current standards that all Certified Crop Advisors must attain and keep current through continuing education.
- Goal 1.2 needs to include an element for economic viability of any alternatives to current crop protection tools, including efficacy of these alternatives in various specialty crop production areas. Consideration of resistance to novel pesticide and herbicide chemistries is critical, especially in high-value crops.
- Goal 1.3 should include consideration for nutritional benefits from fresh food products, not just environmental and human risks. A balance of all factors when considering prioritization of high-risk pesticides is needed to ensure that specific crops are not eliminated because there are no viable alternatives in cases of disease and pest infestations. Simply labeling a chemical as high-priority does not consider the economic considerations of producing healthy, fresh food products. Until extensive scientific research proves that an alternative biological solution will provide the same benefits as a high-priority chemical, there should be continued availability and use of those chemicals.
- There is no explanation or definition of “formal mitigation” for at least two identified priority pesticides; this needs to be clarified so the agricultural stakeholders understand what is meant with this sub-goal.
- For Goal 1.4, there should be a broader understanding of what SPM technical support will be providing and to whom. Advancing grant funding to support projects and research into SPM alternatives will require significant amounts of investment, project planning, and field trials; this is a decades-long process, based on how current research projects are brought forward through proof of concept and then field trials. The agricultural stakeholders should not be expected to carry this financial burden should grant funding fall short of these goals.
- Goal 2: Track, Evaluate, and Enforce Safe Pesticide Use states, “DPR will prioritize data collection and enforcement in disproportionately-impacted agricultural and urban areas, enhance the capacity of state

and county enforcement programs, and strengthen relationships with all partners to inform department priorities and actions.” This statement *presumes* that pesticide applications are not safe currently, which is not supported by the data already collected through Ag Commissioner reporting requirements. The evidence is already documented through the reporting process that all applicators must make monthly; this data is known and the impacts have been minimal because of the strict regulations surrounding “safe pesticide use.” Further, enforcement actions were recently ‘enhanced’ through legislative action that the Governor has now signed. This statement and goal requires modified to reflect that California already has the strictest regulations for pesticide applications in the country, and that growers and their applicators are successfully meeting those strict requirements.

- Goal 2.1 duplicates actions already undertaken by other state and federal agencies; monitoring of ecosystems is sufficient through these other resources and would be duplicative by DPR. Further, there is no indication of what “organisms” DPR would be interested in specifically tracking (that are not already being tracked and monitored by other agencies).
- Goal 2.2 assumes that a one-size-fits all policy for how DPR will interact with Ag Commissioners will improve pesticide applications that are already made according to California regulatory requirements. There is no documented evidence showing where pesticide compliance is not already met and reviewed by Ag Commissioners. There are already significant regulatory structures around schools; this fails to recognize that children of farmers attend these schools and that applications, if near schools, are made when students are not present or will not be present for significant timeframes, such as weekends. Many Ag Commissioners have already reviewed this in their Counties and have implemented standards of application in these instances (for example, buffer zone areas).
- Goal 2.3 presumes there is a significant issue with pesticide mill audits and miscalculations; there is no evidence to suggest that an increase in audits is necessary or warranted.
- Goal 2.4 should be eliminated fully from this strategic plan as it duplicates requirements for worker safety by Cal/OSHA and other workplace regulatory agencies. This is an unnecessary duplication of effort and will add significant costs to farm employers if additional requirements for training and reporting are implemented by DPR.
- Goal 3: Foster Engagement, Collaboration, and Transparency is generally supported as long this does not mean that activist groups will have direct access to locations of farm chemical applications, dates of applications, and personal information about the farm ownership or management. Broadening training sessions and providing relevant information to communities and tribes about farm chemical use and the safe applications of those chemicals is critical to gaining full understanding that farms are using these chemicals safely and within the confines of the strict regulatory structure. As noted in our prior comment letters about the statewide notification system, there are many considerations that must be taken into account for timely application during pest infestations; farmers cannot wait for extended notification periods while a pest or disease consumes their crops, nor should they be exposed to activist actions that hinder farming operations or endanger their employees. Statewide application notification will be a burden for all concerned, as it duplicates current application and notification processes in place at the County level through Ag Commissioner offices.
- Goal 3.4 states, “... provide resource support for county-based language access and increase community engagement.” This should not be an unfunded mandate on County Ag Commissioners and their staff, and should be reflective of the unique characteristics that make up any County’s agricultural producer community. A one-size-fits-all solution will not be effective when providing foreign language access.
- Goal 4: Promote Excellence and Innovation should include agricultural professionals, not only academics or theoretical interpretations of how farming should be managed relative to crop protection.

What is missing from the entire strategic plan document is how pest and disease infestations will be managed when detected, and more importantly, control of vectors that carry diseases. California is currently under assault from a fruit fly infestation, the worst in many decades, threatening the ability to move product through the supply chain. Leafy greens are severely impacted by impatiens necrotic spot virus (INSV), rendering thousands of acres each year as complete crop losses, and has no known biological control nor any chemical solution. Molds and

powdery mildew threaten leafy greens, strawberries, and vegetable crops each year, continuously mutating against any eradication efforts. Huanglongbing (HLB) poses a serious threat to California's thriving citrus production and could be fatal to all citrus trees similar to impacts experienced in Florida, again with no known biological or chemical control. Light brown apple moth, now endemic, continues to pose a threat to our environment as well as our crops. Bark Beetle has destroyed millions of trees in our forest regions. More discoveries of spotted lanternfly in the Midwest region indicate this pest is moving rapidly towards the Pacific Coast states. The list of threatening pests and diseases continue to increase each year, unabated.

Farmers and vineyard operators need tools in the tool box to battle exotic pests and diseases, in addition to those already established in California's environment. Categorizing various agricultural chemicals as priority for removal from the tool box without significant investment in research and viability of alternatives will threaten our entire statewide environment, both natural and working.

We cannot be shortsighted about our battle with pests and diseases; indeed, the bugs are winning. California's environment will continue to be under threat from exotic pests and diseases as the global marketplace continues to expand and international transfers of exotic fruits and vegetables by consumers continues to introduce challenges. Arbitrary decisions about crop protection chemicals will endanger our environment and economy at the same time, and destroy some of the best farmland in the world. Decisions on farm chemical use should be based on solid science and research, not social experiments.

Thanks for considering our comments for the proposed Strategic Plan.

Sincerely,



Norman C. Groot  
Executive Director

cc: Juan Hidalgo, Monterey County Agricultural Commissioner  
Jim Houston, Administrator, California Farm Bureau