July 25, 2024

Ms. Julie Henderson, Director
Department of Pesticide Regulation
1001 I Street
P.O. Box 4015
Sacramento, California 95812-4015
dpr23003@cdpr.ca.gov

RE: DPR 23-003 Statewide Notification of Agricultural Use of Restricted Materials

Dear Director Henderson:

Thank you for this opportunity to provide comments regarding the proposed DPR Statewide Notification System. As a member of the agricultural community, my first priority is to ensure my pest management practices protect my community, farms, and the environment.

While I recognize that the legislature has directed DPR to implement a notification program, I ask that you continue to consider the safeguards already built into the regulation of pesticides while developing this program. As DPR has stated itself in its recent public hearings, prior to the approval of any pesticide, products are thoroughly evaluated for human health and environmental safety, and in consultation with other agencies, safety mitigations are established and enforced.

With this in mind, I ask the Department to consider the following:

- Notification should continue to be limited to pesticide products that are already subject to Notices of Intent
- Timeframes to submit Notices of Intent to County Agricultural Commissioners should remain as originally proposed of 24 hours.
- Public notifications should only include what information is *absolutely* necessary: product applied, intended date and time of application, and spatial geographical location (base, meridian, township, range, and section)
- Personally identifying information, such as acreage treated or exact location, should not be included—this is critical to grower, applicator and employee safety

Thank you for your consideration of my comments. I appreciate DPR engaging with agricultural stakeholders and encourage you to continue to engage early and often with the agricultural community to be sure that negative consequences are managed.

Sincerely,

Michael Kennedy
President/CEO
Green Valley Farm Supply