



**RANCHO ROYAL
OAKS, L.L.C.**
Certified ORGANIC

July 27, 2024

Dear Director Henderson:

We are writing in response to the July 2024 30-Day Comment Period on Pesticide Application Notification Regulation. As a member of the agricultural community, we work hard to ensure our pest management practices protect my community, my farm and the environment. We have confidence in the federal, state and local oversight of pesticide use enforcement. Considering these rules and regulations, we do not believe that statewide notification is necessary in anticipation of pesticide applications.

California already has the most comprehensive notification regarding pesticide applications in the country. Along with adherence to federal pesticide regulations, California's agency CalEPA has created unparalleled pesticide regulatory programs, including the requirement for local permitting authorities to review pesticide application requests. In addition to local authority oversight of pesticide applications, each application request must be recommended by a state licensed pesticide control advisor. The state pesticide regulatory program offers the public the ability to appeal a permit decision with local authorities. All pesticide applications are recorded by DPR and are available to the public. With DPR's current communication methods and information accessibility for the public, the pesticide notification system is duplicative and not necessary.

If this system is implemented, we encourage DPR to engage early and often with the agricultural community to be sure that negative consequences are managed.

Sincerely,

CJ Miller

Royal Oaks Farms LLC

Rancho Royal Oaks LLC