



NuVista, LP

July 24, 2024

California Department of Pesticide Regulation
1001 I Street, P.O. Box 4015
Sacramento, CA 95812-4015
Dpr23003@cdpr.ca.gov

To whom it may concern:

On behalf of NuVista, LP we write to express our opposition to the proposed Pesticide Notification System. CDPR and the County Ag Commissioners already have the most stringent pesticide control system in place, and this proposal will not provide any more protections. In fact, we are concerned that CDPR will provide farm specific information which will allow anti-pesticide activists to oppose our applications. CDPR should not give in to activists and should instead actively defend the already protective system currently in place. What will CDPR do in case an application is appealed and delayed unnecessarily?

1. We oppose the proposed pesticide notification system
2. We oppose providing acreage information that could be used to identify the exact parcel where the pesticide is being applied
3. CDPR needs to explain the pesticide registration process and how application rates, buffer zones, and allowed uses are determined to prevent exposure to workers, residents, and innocent bystanders.
4. If CDPR moves forward, notification should be limited to only those who are immediately adjacent to the proposed application and not open to just anyone who so desires.

Sincerely,

A handwritten signature in black ink that reads "Janet Rabo". The signature is written in a cursive, flowing style.

Janet Rabo
Vice President, Finance
NuVista, LP