

RE: Statewide Notification of Agricultural Use of Restricted Materials

July 25, 2024

Dear Director Henderson:

As a member of the agricultural community, I work hard to ensure my pest manager protect my community, my farm and the environment. I have confidence in the federal oversight of pesticide use enforcement. Considering these rules and regulations, I believe that statewide notification is necessary in anticipation of pesticide application.

Should the Department continue to move forward with this project, I ask the Department to consider the following items:

- Notification should be limited to pesticide products that are already subject to a Notice of Intent.
- Timeframes to submit Notices of Intent to County Agricultural Commissioners remain as it is in current practice.
- Public notifications should only include what information is *absolutely necessary* (pesticide name, intended date and time of application, and general geographical location (county, meridian, township, range, and section)).
- Personal identifying information, such as acreage treated or exact location, should not be included—this is critical to grower, applicator and employee safety.
- Because advanced notice is highly likely to trigger appeals of NOIs and stall agricultural operations, the Department should prepare for these administrative burdens, act quickly to process NOIs, and prepare for extended liability for crop loss.

As this system is implemented, I encourage the Department to engage early and often with the agricultural community to be sure that negative consequences are managed.

Sincerely,

