

Statewide Notification of Agricultural Use of Restricted Materials (DPR Regulation No. 23-003)
Notificación a Nivel Estatal sobre el Uso Agrícola de Pesticidas Restringidos (Reglamentación No. 23-003 del DPR)

Public comments/ Comentarios públicos

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Comments/Comentarios: _____

I would like to comment that the proposed regulation for the Spray Days system be limited to only those pesticides that currently require an NOI. To try to extend the system to all chemicals would be an onerous task for my business. We spray approximately 2400 fields a year and to submit an NOI for each field would take over 50 man days.

My second point is that currently there is a mechanism in place for the applicators that inadvertently drift on another crop or spray someone in a field. There should also be a consequence mechanism for this program. If someone enters a field during an application to try to disrupt the application, then that person(s) should be subject to fines and enforcement actions by the County Ag Commissioner. The law should treat all players equally.

A person entering a field while an application is being made with an airplane compromises the safety of that pilot. A pilot cannot land safely with a load. To land he would have to dump the load, causing a greater hazard in a different area, and then land. There are enough deaths of Ag pilots every year, (so far this year 10 in the US) For one more death to be caused by someone deliberately entering a field to disrupt the application is unconscionable.