



475 N. Palora Ave. Ste A
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August 1, 2024

Ms. Lauren Otani, Senior Environmental Scientist (Specialist)
Department of Pesticide Regulation
1001 I Street
Sacramento, CA 95814

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

Dear Ms. Otani,

The Yuba-Sutter Farm Bureau is a voluntary, non-profit organization made up of nearly 680 members across Yuba and Sutter Counties. Established in 1919, we work for the betterment of family farmers and ranchers. We believe in investing in practices to safeguard growers, employees, and the public.

We appreciate this opportunity to comment on the proposed regulations for the Statewide Notification of California Restricted Materials applied in a production agricultural setting. We have concerns about the Notice of Intent (NOI) system regarding the public notification requirements, their impact on growers and the possibility of a notification leading to an unintended identification of the site-specific location of an application. Such site-specific information may lead to the potential harm of an operator and/or their employees, violation of their privacy, or trespassing on their private property or businesses. We propose that the information disclosed should be limited to active ingredients, permit and county numbers, application date range, and relevant label information. We do not believe it is necessary to include the method of application, the acres treated or the exact location.



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We also think it is imperative to emphasize that these proposed regulations apply only to California-restricted material use as defined in 3 CCR section 6400 and only for the production of an agricultural commodity. Our growers are respected members of our community. They also apply materials that are not listed as restricted. We do not want the general public to fear the use of products not listed as restricted materials and start questioning farming practices that have been proven to be safe.

We appreciate the exemptions that can be made by the Commissioner to the time requirements outlined in subsections (c), (d), and (e). Production agriculture can be impacted by weather which growers cannot. The exemptions allow growers to work with county Commissioners to address those situations on a case-by-case basis. We respect our Commissioners and trust their training and understanding of production agriculture to assess situations that would require an exemption from the NOI.

We appreciate your consideration, and we look forward to the department addressing these recommendations and concerns in a subsequent public notice of modifications to the proposed regulation.

Sincerely,

A handwritten signature in black ink that reads "Brian Greathouse". The signature is fluid and cursive, with a long horizontal stroke at the end.

Brian Greathouse
Yuba-Sutter Farm Bureau President