



CALIFORNIA SAFFLOWER GROWERS ASSOCIATION
P.O. Box 457
Corcoran, California 93212

July 25, 2024

Ms. Julie Henderson, Director
Department of Pesticide Regulation
1001 I Street
P.O. Box 4015
Sacramento, California 95812-4015
dpr23003@cdpr.ca.gov

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

Dear Director Henderson:

I am writing to you on behalf of the California Safflower Growers Association. We appreciate the effort CDPR has made to listen to concerns regarding the proposed pesticide application notification program.

The remote and in-person public listening sessions demonstrate a large knowledge gap between the interest groups. Agriculturalists are dedicated to the health of communities, farms, employees, neighbors, and the environment. Much of the feedback that has been presented at the various listening sessions would depict growers as haphazardly applying restricted use materials.

Federal EPA, DPR, and local County Agricultural Commissioners ensure that proper safety precautions are in place. As DPR has stated itself in its recent public hearings, prior to the approval of any pesticide, products are thoroughly evaluated for human health and environmental safety, and in consultation with other agencies, safety mitigations are established and enforced.

Our comments regarding the proposed regulations are as follows:

- We oppose the proposed pesticide notification system
- We oppose providing acreage information that could be used to identify the exact parcel where the pesticide is being applied. This is crucial to the safety of the agricultural employees and applicators.
- 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.
- 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.

County Agricultural Commissioners exercise extreme caution when granting restricted use permits. Being local, they have the benefit of intimate knowledge of sensitive areas and people. I fear much of their oversight will be undermined with a broad sweeping state-wide program. California has very diverse agricultural production, climates, and neighbor relations. For this reason, we do not support going forward with this policy of a state-wide notification program but if you must, I have additional concerns.

It is especially important that the anonymity of the farm be kept. As much as this proposal will establish fear of agricultural pesticide use, it also creates fear amongst farmers that they will be targets of the activist community. We know that missing an application period with a certain material could make the difference between a crop that can be harvested and one that must be mowed down.

According to current regulations, all NOIs must be filed within 24 hours of the start of the potential treatment. These NOIs are submitted to the CalAgPermits system, managed by County Commissioners. After submission, Commissioners review and approve permits, impose mitigations and applicators may begin within 24 hours and take up to 4 days. We support a 24-hour notification, at a maximum, to interested parties, but only if it results in no change to the NOI submission requirements.

We strongly believe that if the intent of a notification system is to support community members' interest in knowing about applications, then the system must be geographically limited. Notifying individuals who are not impacted by a pending application serves no public or individual benefit and would only result in confusion or unnecessary fear from constant notification of applications hundreds of miles away.

Thank you again for careful consideration of these comments.

Sincerely,

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

Laura Brown
Executive Director