



July 30, 2024

Dear Director Henderson:

As a member of the agricultural community, I work hard to ensure my pest management practices protect my community, my employees, my farm and the environment. Farmers, like so many other professions, have access and use many different sources of technology to monitor different weather conditions. These systems monitor wind speed, temperature, humidity, and rain, just to name a few; and are used to make decisions when it comes to pest management.

Farmers are highly regulated, and must follow an abundance of laws and reporting requirements. The federal, state, and local oversight of pesticide use enforcements already in place to ensure the safety of my community, employees, farms, and the environment are more than adequate. Considering these rules and regulations, I do not believe that the changes to the CDPR's Advance Pesticide Notification System are necessary in anticipation of pesticide applications.

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

1. Notification should be limited to pesticide products that are already subject to Notices of Intent
2. Timeframes to submit Notices of Intent to County Agricultural Commissioners should remain as it is in current practice
3. Public notifications should only include information is absolutely necessary, such as:
 - a. product applied
 - b. intended date and time of application, and
 - c. general geographical location (base, meridian, township, range, and section)
4. Personally identifying information, such as acreage treated or exact location, should not be included—this is critical to grower, applicator and employee safety
5. Because of the high probability that advanced notice will trigger appeals of NOIs and stall applications, the Department should prepare for these administrative burdens, act quickly to protect the right to farm, and for extended liability for crop loss.

If 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,

Mark Giannini, CEO
Giannini Farms, Inc.