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July 29, 2024

Ms. Julie Henderson
Director
California Department of Pesticide Regulation
P.O. Box 4015
Sacramento, CA. 95812-4015

Re: ***Proposed Pesticide Application Notification Requirements***

Delivered via email to dpr23003@cdpr.ca.gov

Dear Ms. Henderson,

On behalf of the over 300 cotton growers and 15 operating cotton gins in California, the California Cotton Ginners and Growers Association wants to thank you for the opportunity to provide comments on the California Department of Pesticide Regulation's (CDPR) Statewide Pesticide Application Notification System. We are deeply concerned with this proposal and the potential abuse of the system and overarching impact it may have on the agricultural industry's ability to conduct its day-to-day business. We adamantly oppose this proposal as currently set forth, as we feel strongly that CDPR and EPA have already built in the necessary protections in the application of pesticides, and where necessary have already imposed notification requirements to those who might be impacted.

We believe CDPR has the most robust and restrictive pesticide use system in the United States, if not the world. There are numerous pesticides registered in the other 49 states, but not in California due to its more rigorous pesticide regulatory system, and higher more restrictive standards. Anyone can rest assured, pesticide applications in California are the most highly regulated applications in the country. This is especially true for restricted use pesticides. We must already file a Notice of Intent (NOI) with the county ag commissioner prior to any application of a restricted use pesticide. It must also be recognized the County Ag Commissioners throughout this state employ 500 inspectors and conduct more than 30,000 inspections each year of farms, ranches and other operations to make sure we are following CDPR's pesticide regulations, pesticide label restrictions and worker protection standards. No one else in the world can take credit for such a protective system for pesticide applications.

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CDPR is proposing to allow anyone who wants to be notified access to search for and/or be notified on any pesticide application where they can provide an address. We find this to be unwarranted, and frankly unjustified. If someone does not live at that address or is not impacted by the potential pesticide application within that area, what is the purpose of the notification? We are very concerned this proposal will be a mechanism used to disrupt, possibly even stop, pesticide applications. As evidenced by the pilot project in Monterey County, where more than 60% of the people signed up to receive notifications live outside of the state of California (far outside of any possible impact zone), and multiple pesticide applications have been temporarily stopped due to appeals by anti-pesticide activists, the notification system proposed by CDPR will ultimately cause statewide panic, and widespread delays in necessary pesticide applications. Without scientifically supported justification, we simply do not support unlimited notification.

CDPR is proposing to allow users to “anonymously” enter a valid address to access notifications. This is not acceptable in any way. As stated above, we believe this will allow anti-pesticide activists to access this information even when they are nowhere near the pesticide application or more importantly, impacted by the pesticide application. By providing this type of access, CDPR is setting up growers for unwarranted appeals and protests by activists, without justification or even any possible exposure to the pesticide application. For that reason, we also adamantly oppose this provision. If a notification system is implemented it is imperative that it is strictly limited to only those actually and physically potentially subject to exposure.

In closing, we thank you for the opportunity to provide comments and urge you to give every consideration to the comments provided herein. Should you have any questions, please feel free to contact me at (559)252-0684 or via email at roger@ccgga.org.

Sincerely,

A handwritten signature in blue ink that reads "Roger A. Isom". The signature is fluid and cursive, with the first name being the most prominent.

Roger A. Isom
President/CEO