

Terry Gage

Dear Director Henderson:

Members of the aerial application industry work hard to ensure that pesticide applications are made in a safe and effective manner. And we know that pesticides have rigorous evaluation from US EPA and DPR before being approved for use and that label language and county permit conditions add additional mitigation of potential impacts from pesticide applications. Considering the current rules and regulations that govern pesticide applications, we do not believe that statewide notification is necessary.

Should the Department continue to move forward with this project, we encourage the Department to consider the following:

1. Notification should be limited to pesticide products that are already subject to Notices of Intent (NOI). There is already a system in place to communicate proposed applications of these products with the county Ag Commissioners.
2. Timeframes to submit Notices of Intent to County Agricultural Commissioners should remain as it is in current practice to allow for timely control of pests that threaten yields.
3. Public notifications should be limited to: product applied, intended date and time of application, and general geographical location (base, meridian, township, range, and section) as these are all currently included in the NOI process.
4. Specific location information or other identifying information, such as acreage treated, should not be included.
5. Because NOIs have triggered appeals and stalled applications, there needs to be a process in place to quickly address these appeals to mitigate crop loss and the likelihood of trespass on agricultural lands that impact application timing and efficiency.

As this system is implemented, we encourage the Department to engage early and often with the agricultural community to be sure that negative consequences are managed.

Sincerely,

Terry Gage, CAE

California Agricultural Aircraft Association