

California Specialty Crops Council

Dear Director Henderson:

I am the Executive Director of the California Specialty Crops Council. The California Specialty Crops Council (CSCC), a 501(c) 5 non-profit organization, is a trusted source of field-based information spanning horticultural crop production, pest management, food safety and stewardship activities in fruit, root, vegetable, and vine crops (fresh, dried, and processed). Combined, over 2,600 CSCC growers generate \$5.0 billion annually on approximately 518,000 acres of California farmland. This represents 7% of the acreage in agricultural production in the state of California.

Our members include:

CA Cherry Board, CA Celery Research Board, CA Prune Board, CA Fresh Carrot Advisory Board, CA Garlic and Onion Research Advisory Board, CA Leafy Greens Research Program, CA Melon Research Board, CA Pear Advisory Board, CA Pepper Commission, and the Artichoke Research Association.

We come forth because the membership of the California Specialty Crops Council works hard to ensure that our member commodities' pest management practices protect our communities, our farms and the environment. Through our members' assessments, they invest annually in research which explores alternatives to currently used pesticides, into the development of genetic resistance for our crops, into new types of ag automation that will reduce pesticide use and into the research infrastructure (primarily through the UC system) which we rely on to perform these trials and continue this important work. We do this because we want the industry to continue to thrive in California. We have confidence in the federal, state and local oversight of pesticide use enforcement. Considering these rules and regulations, we do not believe that statewide notification is necessary in anticipation of pesticide applications.

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

- Notification should be limited to pesticide products that are already subject to Notices of Intent.
- Timeframes to submit Notices of Intent to County Agricultural Commissioners should remain as it is in current practice. Sometimes just a day can make the difference between saving a crop or losing a crop.
- Public notifications should only include what information is absolutely necessary: product applied, intended date and time of application, and general geographical location.
- Information that could potentially identify an individual farmer or farm location, such as acreage treated or exact location should not be included. This information is critical to grower, applicator and employee safety.
- Advanced notice could very likely trigger appeals of NOIs and delay applications. The Department should prepare for these administrative burdens, act quickly to protect the right to farm, and prepare diligently for extended liability for crop loss. We use these materials to protect our crop from major loss. Not making these applications at the right time, as IPM practices recommend, will have an impact on yield and system wide sustainability.

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

Sincerely,

Gary Van Sickle
Gary W. Van Sickle
Executive Director
California Specialty Crops Council