

Roger Smith

Dear Director Henderson:

As a member of the citrus industry, I work hard to ensure my pest management practices protect my community, my farm and the environment. I have confidence in the federal, state and local oversight of pesticide use enforcement. Considering these rules and regulations, I do not believe that statewide notification is necessary in anticipation of pesticide applications. The use is best managed at the County Ag level.

It should also be noted that a vast majority of pesticides in use today have very low mammalian toxicity, so expanding the notification isn't relevant to current circumstances.

In addition, adding reporting requirements will just create more state bureaucracy at a time when California can't afford it.

Should the Department continue to move forward with this project, I ask the Department to 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.
- Public notifications should only include what information is *absolutely* necessary: product applied, intended date and time of application, and general geographical location (base, meridian, township, range, and section).
- Personal identifying information, such as acreage treated or exact location, should not be included—this is critical to grower, applicator and employee safety.
- Because advanced notice is highly likely to trigger appeals of NOIs and stall applications, the Department should prepare for these administrative burdens, act quickly to protect the right to farm, and prepare for extended liability for crop loss.

As 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,

Roger W. Smith

Citrus grower
Exeter, CA.