

# Ratto Bros., Inc.

July 30, 2024

Ms. Lauren Otani, Senior Environmental Scientist (Specialist)  
Department of Pesticide Regulation  
1001 I Street  
P.O. Box 4015  
Sacramento, California 95812-4015

**Subject: Comments on the Department of Pesticide Regulation's 30-day notice of modifications to the proposed restricted material use notification regulations.**

Dear Ms. Otani:

Ratto Bros., Inc. is a family farm operating in California for the past 119 years. We appreciate this opportunity to comment on the Department of Pesticide Regulations' (DPR) NOTICE OF MODIFICATIONS TO TEXT OF PROPOSED CHANGES IN THE REGULATIONS PERTAINING TO STATEWIDE NOTIFICATION OF AGRICULTURAL USE OF RESTRICTED MATERIALS, dated July 2, 2024.

Our company generally supports the proposed modifications that provide clarity to growers regarding the required timeframes for submitting notice of intent (NOI) information to DPR depending on the type of pesticide being applied (e.g., fumigant pesticides applied to soil).

Nevertheless, we have a few concerns that we would like DPR to consider while moving forward with the proposed changes. Our family has been farming leafy vegetables for many years. We have constantly adapted our techniques and operations with the changing times and increased regulations. One thing that has remained steadfast over the decades; our operation endures the challenge of growing crops outside. We are at the mercy of the weather every day; sun, cold, rain, fog and everything in between. While we can try to plan for each weather event, they are not absolute, requiring daily operational changes to fit the environment of that day. We believe there needs to be flexibility and relief in the regulations as it pertains to dates and times. If we submit a NOI for an operation in 2 or 3 days time, but the climate or weather do not support that application, that NOI should be valid until the work is completed, or at a minimum for 5 working days. We do not have the capacity to constantly submit NOIs as we navigate the weather (of which we have zero control).

We also believe that the grower specific information should remain private, or at a minimum, available only to the public in the immediate surrounding community. The actions and applications we perform are based on science, experience and issues we have in our growing operations. We believe in being good neighbors within our community, and there needs to be some level of communication. Statewide broadcasting of private information in the modern world of news cycles and social media, messaging can be construed based on individual interpretation and that is a huge fear among many farming families. Is it possible to consider an "opt in" system for the public that

lives, works or attends school in a particular geographical area that could potentially be impacted by the applications. There is a risk to providing application data to the numerous groups in our State who unfortunately hold a negative perception of agriculture and farmers in our State.

In summary, I would like to thank DPR for the opportunity to comment. Making some slight adjustments or added flexibility to the NOI process or timeline would fit the realities of farming outdoors in California. Limiting the application data and details would also offer some security and safety to the farmers and employees who are responsible for the applications.

Thank you again,  
Anthony Ratto  
Ratto Bros., Inc.