

# Sacramento County Farm Bureau

Dear Ms. Otani,

The Sacramento County Farm Bureau is a grassroots membership organization focusing on preserving and protecting our agricultural economy and rural lifestyle since 1917. Area growers work hard to supply consumers with high quality products while battling such obstacles as increased production costs and water availability. As the earth's original conservationists, farmers and ranchers have a keen interest in preserving our precious land for future generations. Farmers are concerned with natural resources, animal health, water, and air quality, among other imperative topics. Farm Bureau's voluntary elected leaders and professional staff work hard for all Californians to ensure the rural economy's growth, to protect the family farm, and to maintain the priceless natural resources that are so important to this state's vitality and lifestyle.

The Sacramento County Farm Bureau is concerned with the long-term repercussions to this NOI system, as releasing personal information to the public is likely to result in a surge of unfounded appeals against NOIs, delaying essential pesticide applications. This delay can cause significant crop loss, further pest outbreaks, increased legal reviews, and slower response times from DPR. The provisions allow any individual to appeal against an NOI which heightens the likelihood of these negative outcomes. Excessive appeals, as well as many other complications, will be addressed by the County Agricultural Commissioner first, and will impose an undue administrative burden at our local level. The proposed regulations will require the County Ag Commissioner's office staff to allocate more time on in-office permit reviews, pesticide use report entries, the 24-hour deadline to submit reports once received, and an increase in public record requests. Restricted Materials Permit reviews would require more licensed staff and would take inspectors out of the field to conduct this work that they normally do not do. The importance of the current pesticide use enforcement program is in the field time of enforcing current regulations, educating applicators and pesticide handlers, and helping to ensure the safe and effective use of legal, registered pesticides. Increasing the County Ag Commissioner's office workload with paperwork that requires quick turnaround times, is not going to strengthen the program. The intent to notify nearby community members so that they can make decisions on where they want to be when a pesticide is being applied is their personal decision, but they should not be able to appeal prior to an application. The growers who are applying the pesticide have already gone through extensive training, consultation with a PCA, and have followed all regulatory requirements in order to apply a pesticide at a particular point in time on a particular crop. It is a process that includes prior analysis and reporting, not a random decision. If a grower does not go through this proper protocol, the enforcement component of the County Ag Commissioner's department is the appropriate process to investigate and correct violations of use. This system is already working well. If the public has issues with an application that they think was incorrectly applied, then they are allowed to file a report. But to hinder an essential application based on fear that will cause larger issues is not a reason to create this overreaching system.

The proposed modifications also require DPR to consult with a specific set of groups; DPR Environmental Justice Advisory Committee and the State Board of Food and Agriculture. This review process does not fairly represent all stakeholder's concerns and recommendations. DPR needs to include additional groups with relevant expertise, such as the Agricultural Pest Control Advisory Committee.

We appreciate your consideration, and we look forward to the department addressing these recommendations and concerns.

Sincerely,  
Amber McDowell Executive Director



# SACRAMENTO COUNTY FARM BUREAU

PUTTING THE FOOD ON YOUR FORK SINCE 1917

August 1, 2024

Ms. Lauren Otani, Senior Environmental Scientist (Specialist)  
Department of Pesticide Regulation  
1001 I Street  
Sacramento, CA 95814  
[Dpr23003@cdpr.ca.gov](mailto:Dpr23003@cdpr.ca.gov)

**RE: DPR 23-003 Statewide Notification of Agricultural Use of Restricted Materials**

Dear Ms. Otani,

The Sacramento County Farm Bureau is a grassroots membership organization focusing on preserving and protecting our agricultural economy and rural lifestyle since 1917. Area growers work hard to supply consumers with high quality products while battling such obstacles as increased production costs and water availability. As the earth's original conservationists, farmers and ranchers have a keen interest in preserving our precious land for future generations. Farmers are concerned with natural resources, animal health, water, and air quality, among other imperative topics. Farm Bureau's voluntary elected leaders and professional staff work hard for all Californians to ensure the rural economy's growth, to protect the family farm, and to maintain the priceless natural resources that are so important to this state's vitality and lifestyle.

The Sacramento County Farm Bureau is concerned with the long-term repercussions to this NOI system, as releasing personal information to the public is likely to result in a surge of unfounded appeals against NOIs, delaying essential pesticide applications. This delay can cause significant crop loss, further pest outbreaks, increased legal reviews, and slower response times from DPR. The provisions allow any individual to appeal against an NOI which heightens the likelihood of these negative outcomes. Excessive appeals, as well as many other complications, will be addressed by the County Agricultural Commissioner first, and will impose an undue administrative burden at our local level. The proposed regulations will require the County Ag Commissioner's office staff to allocate more time on in-office permit reviews, pesticide use report entries, the 24-hour deadline to submit reports once received, and an increase in public record requests. Restricted Materials Permit reviews would require more licensed staff and would take inspectors out of the field to conduct this work that they normally do not do. The importance of the current pesticide use enforcement program is in the field time of enforcing current regulations, educating applicators and pesticide handlers, and helping to ensure the safe and effective use of legal, registered pesticides. Increasing the County Ag Commissioner's office workload with paperwork that requires quick turnaround times, is not going to strengthen the program. The intent to notify nearby community members so that they can make decisions on where they want to be when a pesticide is being applied is their personal



## SACRAMENTO COUNTY FARM BUREAU

PUTTING THE FOOD ON YOUR FORK SINCE 1917

decision, but they should not be able to appeal prior to an application. The growers who are applying the pesticide have already gone through extensive training, consultation with a PCA, and have followed all regulatory requirements in order to apply a pesticide at a particular point in time on a particular crop. It is a process that includes prior analysis and reporting, not a random decision. If a grower does not go through this proper protocol, the enforcement component of the County Ag Commissioner's department is the appropriate process to investigate and correct violations of use. This system is already working well. If the public has issues with an application that they think was incorrectly applied, then they are allowed to file a report. But to hinder an essential application based on fear that will cause larger issues is not a reason to create this overreaching system.

The proposed modifications also require DPR to consult with a specific set of groups; DPR Environmental Justice Advisory Committee and the State Board of Food and Agriculture. This review process does not fairly represent all stakeholder's concerns and recommendations. DPR needs to include additional groups with relevant expertise, such as the Agricultural Pest Control Advisory Committee.

We appreciate your consideration, and we look forward to the department addressing these recommendations and concerns.

Sincerely,

Amber McDowell  
Executive Director