



May 1, 2026

**RE: SprayDays Annual Status Update**

California Department of Pesticide Regulation  
1001 I Street  
Sacramento, CA 95814

Dear Dr. Morrison and Department Staff,

The California Farm Bureau appreciates the opportunity to comment on the SprayDays California First Annual Status Update and recognizes the Department of Pesticide Regulation's (DPR) efforts to provide an overview of system performance, outreach, and early user engagement.

We acknowledge DPR's SprayDays program is functioning as intended, with strong uptime, increasing user engagement, and continued improvements to usability and accessibility. While these operational metrics are helpful, we respectfully reiterate the concerns raised by growers and agricultural stakeholders during the initial development of SprayDays.

At the outset, we note that it remains difficult to evaluate the overall success of SprayDays as a public policy tool. While the report highlights website traffic, user sign-ups, and notification metrics, it does not provide evidence of measurable improvements in public health or safety outcomes. Without clear data demonstrating that the system is reducing risk or improving safety, it is challenging to assess whether the benefits of the program outweigh the potential impacts on growers and agricultural operations, as well as the program's cost to the department.

First, concerns related to grower privacy and security remain unresolved. The system continues to publicly display detailed information about intended pesticide applications, including timing, product information, and location at a one-square-mile resolution. Although DPR emphasizes transparency, this level of detail continues to raise concerns about the potential for trespassing, vandalism, or targeted disruptions. It also increases the risk that pesticide use information may be misused or taken out of context, and the report does not address whether these risks have occurred or how DPR is actively monitoring and mitigating them.

Second, the potential for misinterpretation of pesticide information remains a significant concern. The report indicates that users primarily rely on the interactive map and notifications for localized awareness. However, providing advance notice without sufficient context may lead to misunderstandings about legal and safe pesticide applications. This may



result in unnecessary concern or alarm among the public and could contribute to inaccurate perceptions of agricultural practices. DPR has made improvements to FAQs and outreach materials, but it is possible that these efforts may not be able to sufficiently explain California's advanced regulatory framework.

Third, the system continues to create indirect operational challenges for growers. Although SprayDays does not change pesticide use requirements, the structure of the system affects how application information is shared and perceived. The report confirms that application details are posted when a Notice of Intent (NOI) is submitted and remain visible even if the application does not occur, an issue the Department has acknowledged and indicated it intends to address in the future. This technical issue can reduce growers' flexibility to respond to changing weather conditions, pest pressures, or other operational factors. It may also result in public attention or concern tied to applications that are ultimately rescheduled or never take place.

We appreciate DPR's commitment to ongoing evaluation and refinement of the SprayDays system and its intention to incorporate stakeholder feedback into future updates. As DPR continues to assess system performance and consider enhancements, we encourage the Department to evaluate and report on measurable safety outcomes and real-world impacts to growers, including any security or operational concerns. We also encourage DPR to consider additional privacy protections, ensure that publicly available information is presented with appropriate context, and continue engaging directly with agricultural stakeholders to ensure the system remains practical and workable for farmers and applicators.

California growers are committed to safe and responsible pesticide use under one of the most rigorous regulatory frameworks in the nation. Any additional layer of transparency should be carefully balanced with the need to protect grower safety, maintain operational flexibility, and support accurate public understanding of agricultural practices. We appreciate the opportunity to provide comments and look forward to continued engagement with DPR as this program evolves.

A handwritten signature in black ink, appearing to read 'Isabella Quinonez'.

Isabella Quinonez  
Assistant Director, Policy Advocacy  
California Farm Bureau