



# FARM BUREAU San Diego County

**The Voice of Local Farmers**

Serving San Diego agriculture since 1914

May 1, 2026

Dear Department of Pesticide Regulation,

On behalf of the Crop Protection Taskforce of San Diego County Farm Bureau, we appreciate the opportunity to provide comments on the Spray Days program and annual report. We recognize and support DPR's mission to protect public health and the environment, and we offer the following feedback to strengthen the program while maintaining a balanced, science-based, and effective regulatory framework.

We urge DPR to prioritize the protection of farmer and applicator anonymity. Increasing the specificity of actual applications will only result in increasing challenges for our farming operations beyond those already observed with the existing "one mile" radius. While transparency is an important goal, publicly accessible, highly detailed notification systems risk exposing individual operations to unwarranted harassment, or nuisance complaints especially in urbanized regions. Many applications already occur under strict regulatory oversight, and additional layers of public surveillance should not compromise the safety or privacy of those complying with the law. It is noteworthy that although the main focus of Spray Days is to inform the public in affected areas, the vast majority of those registering are coming from highly populated areas where few if any agriculture operations exist. There is great concern that Spray Days is extending beyond potentially affected parties and will result in challenging dynamics for California's farming communities.

We applaud DPR for focusing on education of the concerned public relative to the safety of the use of crop protection materials and encourage DPR to continue this strategy as a core component of the program. Public-facing information explaining how products are evaluated, registered, and applied safely, as well as the rigorous processes governing the use of restricted use permits should continue to be highlighted with the intent of alleviating unjustified fears. Providing this context will help ensure that notifications inform rather than alarm, and that stakeholders understand the extensive safeguards already in place.

We are overwhelmingly opposed to the expansion of the Spray Days program beyond the application of Restricted Material. Proposed additions - such as advance notification requirements or expanded tracking - should be evaluated in terms of the specific problems they are intended to solve, the measurable benefits they would deliver, and recognizing that consumers and taxpayers will ultimately bear the additional costs. Expanding program scope without this clarity risks creating inefficiencies without improving public health outcomes.

Finally, we strongly recommend that DPR place greater emphasis on data transparency related to regulatory performance in a fashion that highlights the good work that DPR is doing rather than as an alarm to the public. Such information is critical to demonstrating that the current system is functioning effectively. Highlighting the relatively low rate of violations in comparison to total applications can provide important context for public understanding.

In addition, DPR should consider mechanisms to address repeated or demonstrably unfounded complaints that require investigation and divert limited regulatory resources. Harassment of this nature because of Spray Days

cost time, money, and resources for DPR, farmers, and County Ag Commissioner staff. Ensuring that the complaint process remains fair and credible for all is essential to maintaining public trust and program efficiency.

In summary, we support efforts to improve communication and transparency, but we recommend that DPR focus on enhancing public understanding of the existing regulatory system rather than expanding requirements placed on the farming community that may introduce unintended consequences. A balanced approach - grounded in scientific data, education, and respect for both societal concerns and agricultural realities - will best serve all stakeholders.

Thank you for your consideration of these comments. We welcome continued dialogue and collaboration on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Jimmy Ukegawa". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jimmy Ukegawa  
President