



May 1, 2026

Dr. Karen Morrison, Director
California Department of Pesticide Regulations
1001 I St.
Sacramento, CA 95814
spraydays@cdpr.ca.gov

Re: SprayDays California: First Annual Report

Dear Dr. Morrison,

On behalf of the Western Plant Health Association (WPH), I am submitting these comments regarding DPR's SprayDays California (SprayDays) program. WPH appreciates the opportunity to comment on SprayDays and looks forward to working with DPR on refinements as it moves forward. WPH represents the interests of pesticide and fertilizer manufacturers, agricultural biotechnology providers, and agricultural retailers in California, Arizona, and Hawaii.

WPH recognizes that SprayDays is a first in its kind effort by a state or the federal government entity to provide accurate and transparent pesticide information in advance of an application. We congratulate DPR on the success of this effort. In our effort to contribute to the success of SprayDays we offer the following comments that reflect our experience with the program.

DPR Registration and Enforcement Education Program

In our earlier comments related to SprayDays, WPH encouraged DPR to develop more multi-language, reader friendly information on the safety protocols in place to assure the registration of safe pesticide products, and the regulations in place that help assure the health of communities and the environment is protected. WPH congratulates DPR on this effort and we support more information to be developed to better inform communities.

We applaud DPR on the meaningful progress it has made on language accessibility. We note that DPR now offers notifications in 16 languages and supporting Google Translate across the website. However, we note the direct links to DPR's existing informational resources have not yet been incorporated into the SprayDays website, and that educational video content explaining pesticide regulations and registration remains absent from the site.

WPH suggests that DPR perhaps makes this information more accessible by linking it to each of its programs. WPH would also like to recognize DPRs efforts to make its website more community friendly, however we have heard that individuals who are not familiar with DPRs website are still having difficulty finding this information. If DPRs educational materials were included in all program links, this may result in more individuals seeing the information.

This is of particular importance when sharing information related to Restricted Use Pesticides (RUPs) and the independent evaluations conducted by U.S EPA and DPR. Knowledge by communities that DPR requires additional California-specific studies beyond what U.S. EPA requires as part of its registration review would be valuable information to community members. Additional information on the role of County Agricultural Commissioner (CACs) and in approving the actual application of a RUP based on scientifically established protocols and current local conditions could also be helpful to communities.

We believe these efforts would meaningfully strengthen the educational value of SprayDays, provide important context to the notifications, and better serve communities that may be engaging in conversations regarding California's comprehensive pesticide regulations for the first time.

Notification and Cancellation of Pesticide Applications

WPH appreciates the effort DPR has taken to characterize SprayDays as a notification program, reflecting intended pesticide applications submitted through the Notice of Intent (NOI) process for RUPs. This distinction is important because an NOI represents a plan to apply a RUP, subject to CAC approval, and applications may not occur for a variety of reasons.

WPH recognizes that not all NOI cancellations are required to be noticed to CACs or re-noticed when a NOI is rescheduled. However, in the case of fumigants, a cancellation notice is received by CACs, and the CAC is notified of a NOIs rescheduling. WPH asks that in the case of fumigant applications, where a NOI cancellation is received, that SprayDays provides a notification of that cancellation. We recognize that this may result in confusion if repeated notices for both scheduled and cancelled applications are issued via the electronic notices. However, we ask that DPR provide this information via the program's website map system. Since the use of fumigants is an area of interest by local communities and this information is available, we believe it is important to accurately reflect this information.

WPH notes that during DPRs SprayDays virtual update in March, DPR received feedback that it needed to reduce false or redundant NOI notices. Commenters expressed confusion over still actively noticed NOIs that had were duplicative and NOIs that were already completed still appearing on SprayDays maps. This was also noted at the Environmental Justice Advisory

Committee (EJAC) meeting on Friday, April 24th. Public commenters noted that they were confused by the number of notifications they received for pending applications, many of which they understood did not actually take place. Again, we recognize that many NOIs do not require an application cancellation with the CAC, but where there is an opportunity to provide this information, particularly with chemistries of interest to communities, DPR should develop a mechanism to reflect a NOI cancellation as well as the initial NOI.

Identification of Application Location Information

WPH has attended a number of public workshops over the past year, and we recognize that some groups are dissatisfied with the current SprayDays location identification information, and are demanding exact locations, addresses, and personal information of the farm operator and applicator. WPH is opposed to any changes to the current location identification system and supports the current one-square-mile section resolution.

We are very concerned that providing field-level location data could inadvertently encourage members of the public to approach scheduled application sites in order to disrupt the application. Those members of the public would not be equipped with the required personal protective equipment or training necessary to safely be present in or near an active application area. California's pesticide regulations exist precisely to ensure that those present during applications are properly protected. This is a standard that cannot be guaranteed for members of the public who may be drawn to a specific location by precise mapping data.

This would likely also result in the active trespassing of unauthorized individuals onto farms and ranches. This not only endangers those unauthorized individuals but also creates significant safety and liability concerns for growers and their employees. Farm workers and pesticide applicators operating equipment cannot always anticipate or safely respond to the unexpected presence of members of the public in or near an active work area. Additionally, farmers and their employees, including applicators, have a right to their privacy, including the location of their homes and businesses. Just as DPR would never knowingly release the addresses of individuals who sign-up for the SprayDays notifications to protect those individuals privacy, farmers and their employees and contractors deserve the same respect for their privacy.

WPH believes the current one-square-mile section resolution appropriately balances the public's interest in awareness, with the safety and security of California's farming operations and the people who work on them.

SprayDays Funding and Program Evaluation

WPH wishes to acknowledge the sound stewardship of SprayDays fiscal management of this program and that the almost \$2 million in remaining funds will support continued operations

through at least June 2026. WPH supports DPRs budget request for general funds to support the maintenance of SprayDays.

While WPH supports the use of general funds to maintain SprayDays, we are concerned about the long-term financial sustainability of SprayDays. Governor Newsom's Proposed State Budget includes a Budget Change Proposal for ongoing financial support of the system. We ask that DPR provide clarity how you would prioritize operations, maintenance, and public access in a reduced-funding scenario. How does DPR intend to measure and report on the effectiveness of SprayDays going forward, including what metrics will be used to evaluate system performance, public engagement, and accessibility?

The SprayDays program was formally adopted under the agreement that it would be formally reviewed for recommendations to the program in three years. WPH has noted that some interests are demanding that the SprayDays program be fully re-evaluated on an annual basis by the EJAC. WPH is opposed to this change. All programs require time to mature and so the responsible agency can nuance the administration of that program efficiently. To allow one entity to review and make formal change recommendations out of sequence to other agreed upon oversight entities, like the California Department of Food and Agriculture State Board would compromise the balanced evaluation of the program. WPH urges DPR to maintain the agreed upon review timeline of three-years before substantive changes to the SprayDays program are recommended or considered.

Transparency around both the financial sustainability of SprayDays and the criteria by which its effectiveness will be measured is essential to maintaining confidence in the program. We encourage DPR to address these questions in its tri-annual status update and review, and to engage all stakeholders in those discussions.

Conclusion

WPH congratulates DPR on its successful launch of SprayDays as the first program in the nation to provide accurate pesticide application notifications to interested communities. We support DPRs thoughtful development of this program and look forward to engaging with DPR on its continued development moving forward. We thank DPR for the opportunity to comment on SprayDays and ask that if you have any questions regarding our comments to please feel free to contact me.

Sincerely,



Renee Pinel
President/CEO