



May 1, 2026

Submitted Via Public Comment Portal Only

Dr. Karen Morrison, Director
California Department of Pesticide Regulation
1001 I St., P.O. Box 4015
Sacramento, CA 95812-4015

RE: SprayDays California First Annual Status Update

Dear Director Morrison:

The undersigned agricultural organizations (herein referred to as "organizations") submit the following comments in response to the California Department of Pesticide Regulation's (DPR) SprayDays California (SprayDays) First Annual Status Update (Status Update), published March 10, 2026.

Our organizations represent farmers and DPR license holders throughout California who are committed to rigorous compliance with all requirements governing organic and conventional pesticide use. As stewards of the land and employers in our communities, we

take great care to protect the health and safety of pesticide applicators, field workers, and surrounding communities.

We appreciate DPR's commitment to SprayDays California as a tool to advance transparency and public access to pesticide use information in a consistent and reliable manner across the state. We offer the following comments to inform DPR's efforts and look forward to continued collaboration with DPR as the program matures.

Provide Additional Clarity Around Notice of Intent

Our organizations recognize that DPR has taken care to characterize SprayDays notifications as reflecting intended pesticide applications submitted through the Notice of Intent process, rather than confirmed or completed applications. This distinction is important because an NOI represents a plan to apply a restricted material pesticide, subject to County Agricultural Commissioner approval, and applications may not occur for a variety of reasons.

Pest Control Advisors (PCAs) are trained to recommend pesticide applications only under the right conditions, at the right time, and at the right rate. This is a standard that requires ongoing evaluation up to and including the day of a planned application. As a result, a PCA may determine that moving forward with an application is not advisable due to a variety of reasons. Examples may include:

- Changes in weather conditions
- Equipment breakdowns that prevent safe or effective application
- Re-evaluation of pest pressures that reveals levels have not met established action thresholds, or that an alternative control method is better suited to the situation
- Scheduling conflicts or other logistical factors

We do not recommend any additional reporting burden on county agricultural commissioners, pest control advisors, pesticide applicators, or growers to track application outcomes. We recognize that DPR has received public recommendations to label or remove canceled or duplicated NOIs, as well as to indicate when a planned application has been completed. Implementing such changes would impose a significant additional workload on these parties beyond what is currently required by statute, regulation, or the restricted materials permitting process, diverting resources away from meeting existing regulatory obligations. We encourage DPR to address public expectations around application status through clear public education and website messaging, rather than through additional reporting requirements.

Currently, clarifying language appears in limited and inconsistent locations, including embedded within FAQ answers, and partial use of qualified terms such as "scheduled" and "intended" on the homepage and sign-up pages, without explicit explanation of what those terms mean in the context of the NOI process.

The submission of an NOI reflects PCAs and growers working diligently to meet their regulatory reporting requirements, not confirmation that a pesticide application will take place. We encourage DPR to incorporate across the homepage, map page, notification messages, and sign-up pages an explicit clarification that NOIs indicate where pesticide applications may occur, not that they have occurred, along with plain-language explanations of the terms "scheduled" and "intended" as used throughout the system.

Connecting SprayDays to Education About California's Robust Pesticide Registration Process

During the development of SprayDays, we encouraged DPR to incorporate direct access to its already-published White Papers and informational materials on pesticide registration and regulation, and to consider converting these resources into video format to reach broader audiences, particularly those whose primary language is not English.

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

This is a missed opportunity, as the regulatory process governing the pesticides covered by SprayDays is rigorous and worth communicating clearly to the interested public who is accessing this service. Restricted material pesticides are first evaluated and registered by the U.S. EPA through a process that includes more than 300 human health and environmental safety studies. In addition to this federal review, products entering California undergo an independent, comprehensive second evaluation by DPR scientists before they may be registered for use in the state. DPR also requires additional California-specific studies as part of its registration review. This process can take as many as eight years before a new product reaches the market. To further protect public health and the environment, DPR can and does impose additional restrictions on registered products, including designating them as Restricted Use Pesticides.

County Agricultural Commissioners retaining local discretion is a critical component to Spray Days. This discretion includes the ability to impose even stricter restrictions when local conditions warrant and they must receive an NOI prior to any restricted material

pesticide application, based on risk parameters established through the product's registered label and DPR's registration requirements.

Members of the public who do not regularly visit DPR's website may have difficulty locating materials that explain this process, and SprayDays represents an important opportunity to connect users with that information. We continue to encourage DPR to provide direct links from the SprayDays website to relevant DPR White Papers and informational memos on pesticide registration and regulation, in both English and Spanish and explore converting these materials into short-form video content, including subtitles in additional languages to any video resources produced, consistent with DPR's existing commitment to multilingual access.

These steps would meaningfully strengthen the educational value of SprayDays as a public resource, provide important context for the notifications users receive, and better serve communities that may be encountering pesticide regulation information for the first time.

Requests for Exact Location Information

We recognize that publication of this Annual Notice includes a presentation to DPR's Environmental Justice Advisory Committee (EJAC), which occurred on April 24, 2026. At that meeting, the Environmental Justice Advisory Committee (EJAC) recommended that SprayDays provide more precise location information for scheduled pesticide applications beyond the current one-square-mile section resolution. Our organizations have significant concerns about the unintended consequences of disclosing exact application locations.

Providing field-level location data could inadvertently encourage members of the public to approach scheduled application sites. Unlike licensed applicators, members of the public would not be equipped with the required personal protective equipment (PPE) 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.

Beyond pesticide exposure risks, the disclosure of exact application locations raises serious concerns about entering agricultural fields and orchards without proper training. Those who work on farms receive significant workplace training to ensure their safety and that of those they work alongside. The presence of unauthorized people on a ranch or farm not only endangers those 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.

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.

Fund Expenditure & Effectiveness Measurement

Our organizations appreciate DPR's providing updates regarding their stewardship of SprayDays funding in their Status Update. We are encouraged that approximately \$1.92 million in remaining funds will support continued operations through June 2026 and perhaps beyond.

However, we have questions and concerns regarding the long-term financial sustainability of SprayDays. As noted in the Status Update, Governor Newsom's Proposed State Budget includes a Budget Change Proposal (BCP) for ongoing financial support of the system. Nevertheless, state budget processes are inherently uncertain, and we urge DPR to plan prudently for the possibility that this or future BCPs may not be fully funded or may be subject to revision.

Specifically, we ask that DPR provide clarity on the minimum funding level required to sustain essential SprayDays functions; how DPR would prioritize operations, maintenance, and public access in a reduced-funding scenario; and where those funds would come from. Further, 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? How will those evaluations inform future funding requests and program decisions?

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 next annual status update and to engage the agricultural community and other stakeholders in those discussions.

CONCLUSION

Our organizations appreciate DPR's efforts to launch and maintain SprayDays California as a public information tool. The comments provided in this letter reflect our shared interest in ensuring that SprayDays serves the public effectively, accurately, and responsibly.

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Thank you for your consideration of our comments, we look forward to your response.
Please contact us if you have any questions.


Sincerely,



Shirley Rowe, President
African American Farmers of California


Terry Gage, President
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Association

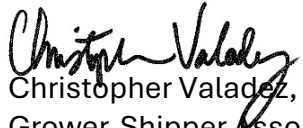

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