



Ventura County Coalition of  
Labor, Agriculture and Business  
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December 7, 2016

Linda Irokawa-Otani  
Regulation Coordinator - Department of Pesticide Regulation  
P.O. Box 4015  
Sacramento, California 95812-4015  
Attention: Brian Leahy, Director  
Email: [dpr16004@cdpr.ca.gov](mailto:dpr16004@cdpr.ca.gov)

**RE: Opposition to DPR Proposed Regulation No. 16-004 - Pesticide Use near Schools**

The Ventura County Coalition of Labor, Agriculture and Business (VC CoLAB) appreciates the opportunity to comment on DPR's draft regulations restricting application times for certain crop protection products within ¼ mile of K-12 schools and child daycare centers, with new notification requirements. This is precedent setting and if adopted, will significantly impact many farming operations and the budgets of adjacent schools and daycare facilities and local Agricultural Commissioners.

In Ventura County there are more than a dozen public K-12 schools that were built adjacent to farmland with no recourse for the growers. It is possible that many of the ¼ mile buffer areas around these facilities will be fallowed due the new DPR requirements. And because Ventura County has a limited number of acres in irrigated production, the fallowing of significant acreage from these draft regulations could threaten the economic viability of our agricultural industry.

There has been significant misinformation about crop protection products circulated by anti-pesticide activists who believe commercial food production can be maintained without these tools. However, because the regulations restrict applications by aircraft, airblast sprayers, sprinkler chemigation, dust, powders and fumigation, from 6:00 am to 6:00 pm daily, this will have devastating impacts on both organic and conventional growers.

It is the responsibility of CA DPR to interpret scientific data and craft regulations that are science based, protecting human health and the environment while insuring the production of food for our society. This regulation completely circumvents the entire federal and state regulatory process that is used to assess product risk, placing unwarranted and unscientific restrictions on vital crop protection methods.

In November, over 1,000 school districts wrote a letter expressing their strong opposition to the proposed regulations. We join them in their opposition and urge DPR to reevaluate the variables farmers deal with, the existing restrictions and notifications, and the potential economic consequences to the AG industry.

Sincerely,

A handwritten signature in black ink that reads "Lynn Gray Jensen".

Lynn Gray Jensen - Executive Director