



VENTURA COUNTY
AGRICULTURAL ASSOCIATION



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October 16th, 2024

Director Julie Henderson
California Department of Pesticide Regulation
Julie.Henderson@cdpr.ca.gov

Subject: Objection to DPR's Participation in the "Toxic Tour" Event on October 19, 2024

Dear Director Henderson,

Thank you for the opportunity to submit comments on behalf of the combined membership of the California Farm Bureau, California Strawberry Commission, Ventura County Coalition of Labor Agriculture and Business, Ventura County Agricultural Association, Monterey County Farm Bureau, Santa Barbara County Farm Bureau, San Luis Obispo County Farm Bureau, and Farm Bureau of Ventura County. We represent a diverse coalition of

agricultural stakeholders committed to promoting and protecting the interests of California's agricultural community. Our organizations encompass farmers, ranchers, laborers, and businesses involved in all aspects of agriculture, including production, processing, and marketing. Together, we advocate for sound agricultural policies, promote sustainable farming practices, support economic development in rural areas, and uphold the vital role agriculture plays in ensuring food security, economic stability, and cultural heritage throughout our regions. We are writing to express our profound objections and deep concerns regarding the upcoming “Toxic Tour” event co-hosted by CAUSE and the California Department of Pesticide Regulation (DPR) in Santa Maria on October 19, 2024.

We were stunned upon receiving the promotional materials for this event, which include inflammatory and misleading imagery—children running through fields implied to be “toxic” agricultural operations. The insinuation that attendees will tour commercial farming areas characterized as harmful is both grossly inaccurate and irresponsibly provocative.

Agriculture is fundamental to human survival. It sustains our communities and our economy and ensures access to safe and nutritious food. Characterizing the agricultural industry—upon which so many in our region rely for their livelihoods, particularly socially disadvantaged communities—as “toxic” is not only factually incorrect but also a gross misrepresentation of a sector that embodies cultural heritage, resilience, and economic stability.

The California Department of Pesticide Regulation released its annual Air Monitoring Report yesterday, which found that no air samples taken at monitoring sites in 2023 detected pesticides at or above health-protective screening levels or regulatory targets.

The fact that DPR, as a regulatory agency, is complicit in amplifying this inflammatory message—whether through cost-sharing, funding, or simply participating—demands immediate rectification. Three critical concerns must be addressed:

Undermining Local Stakeholders

Local community dynamics are essential to the effective management and perception of agricultural practices, particularly when it comes to sensitive topics like pesticide use. The involvement of farmers and agricultural advocates in public relations activities is critical to fostering understanding and building trust within the community.

By organizing on-site or near-site visits in collaboration with activist groups without involving local farmers and agricultural stakeholders, DPR misses a crucial opportunity to engage with the very community it seeks to serve. Such actions can create a disconnect between regulators and the agricultural community, undermining trust and exacerbating tensions.

It is imperative that DPR prioritize collaboration with farmers and ag advocates when conducting public outreach or educational initiatives in addition to their work for NGOs and environmental justice organizations. Engaging these stakeholders in meaningful dialogue not only enhances the legitimacy of the discussions but also ensures that the concerns and insights of those directly impacted by regulatory policies are duly considered.

Deputization of Activists

Equally disturbing is the fact that DPR, through endorsing and sanctioning this event by the prominent display of the DPR logo on all marketing and noticing, has effectively deputized non-government activist groups, granting these groups implied regulatory authority to act under DPR's authority. Such an action would be in violation of state law. Should these unofficial, non-government activist groups gain unauthorized access to private property, or even feel emboldened to surveil agricultural operators, DPR will be complicit in an egregious violation of property rights and due process.

There is a dangerous precedent being set here. When DPR collaborates with activist groups with a clear political agenda, it risks undermining the core principles of impartial regulation. Activist involvement transforms legitimate

regulatory oversight into a witch hunt, whereby businesses complying with the law are unfairly targeted, harassed, and surveilled by individuals with no legal standing or authority.

In the past, we have provided you with reports of these same activists violating re-entry intervals, harassing workers, and disturbing operations—all under the guise of “public interest.” It is unacceptable for DPR to provide a platform that implicitly encourages such behavior. The result is not only a breakdown in trust between regulators and businesses but also a legitimate fear of targeted discrimination based on ideological bias, rather than any failure to comply with state law.

Reaffirming DPR’s Role as an Impartial Regulator

DPR’s mandate is to enforce the law, not to participate in or endorse activist-driven agendas. Your participation in and endorsement of this event jeopardizes the agency’s neutrality and sends a troubling signal that regulatory enforcement can be influenced by external political forces. This is a dangerous precedent for any government agency, and one that DPR cannot afford to set.

In the future, should DPR wish to engage the community on issues of pesticide use, it must do so in collaboration with the County Agricultural Commissioner and with input from the farmers and businesses directly affected by its policies. Excluding these key stakeholders while providing a platform for inflammatory rhetoric is wholly inappropriate and risks undermining DPR’s own authority and mission.

We call on DPR to immediately withdraw its participation from and its endorsement of the “Toxic Tour” and to recommit itself to its role as an impartial, fact-based regulatory body. We also insist on proactive stakeholder engagement that includes robust outreach with agricultural stakeholder in future campaigns to promote discourse on the impact of pesticides on public or community health. Further actions that foster bias, promote activism over lawful regulation, or target compliant businesses will severely damage the

integrity of DPR and erode the trust of the agricultural community it is supposed to serve.

Sincerely,

Shannon Douglas
President California Farm Bureau

Rick Thomlinson
President, California Strawberry Commission

Louise Lampara
Executive Director, Ventura County Coalition of Labor Agriculture and Business

Rob Roy
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