



March 25, 2020

Honorable Gavin Newsom
 Governor
 State of California State Capitol
 Sacramento, California 95814

Dear Governor Newsom:

The undersigned organizations express our gratitude to you and Secretary Ross for ensuring that our State's farmers, ranchers, their vital work force and essential business partners are recognized for the fundamental role they play during this national emergency.

We write to request a formal pause, beginning today, for all open public comment periods concerning both active rulemakings and non-rulemaking (e.g., informal stakeholder) processes that affect agriculture and the food production industry. Our member-informed input into proposed state agency actions is a vital element of sound public policy development and provides State regulators with much-needed perspectives and insight into the potential impacts of State actions. The disruption caused by this pandemic prohibits our ability to participate fully and provide meaningful input as our priorities have shifted toward the care and availability of our workforce, and the tightening logistics around getting food to kitchen tables throughout the United States.

Agriculture and food production are considered an "essential activity" and "critical infrastructure" during the national emergency and California's agricultural sector is solely focused on ensuring the availability of safe and affordable food and agricultural products for our residents and protecting the health and safety of our workforce. However, our members are confronted by labor shortages for multiple reasons, supply chain disruptions and a host of other challenges created by the COVID-19 crisis.

At the same time, state agencies like the California Air Resources Board (CARB), Regional Water Boards, Department of Pesticide Regulations (DPR), Cal/OSHA and others are continuing to advance complex new regulatory processes unrelated to the national emergency. These efforts ignore the significant disruption the State's residents and businesses are facing at this difficult

time. While some agencies, such as the Department of Water Resources (DWR) and the Central Coast Regional Board did extend some timelines last week, our request is that all timelines be paused until shelter in place orders are no longer in effect.

We request that you issue an Executive Order directing State agencies to temporarily halt regulatory proceedings (including comment periods) affecting agricultural operations which have not already been approved by the California Office of Administrative Law.

We fully understand the importance of the public policy matters affected by this request but believe that such action is essential for thoughtful and meaningful engagement by the public.

Sincerely,



Emily Rooney, President
Agricultural Council of California



Jane Townsend, Executive Director
California Alfalfa and Forage Association



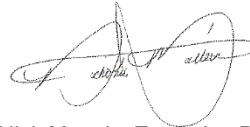
Elaine Trevino, President and Chief Executive Officer
Almond Alliance of California



Ruthann Anderson, President/CEO
California Association of Pest Control Advisers




Richard Matoian, Executive Director
American Pistachio Growers



Nick Matteis, Executive Director
California Association of Wheat Growers



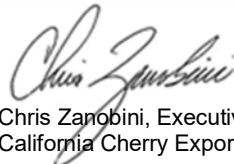
Debra Murdock, Executive Director
Association of California Egg Farmers



Jane Townsend, Executive Officer
California Bean Shippers Association



Terry Gage, President
California Agricultural Aircraft Association



Chris Zanobini, Executive Director
California Cherry Export Association



Jane Townsend, Executive Director
California Agricultural Irrigation Association



Chris Zanobini, Executive Director
California Cherry Growers and Industry Association



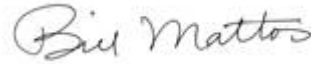
Casey Creamer, President
California Citrus Mutual



Ken Dyer, President
California Pork Producers Association



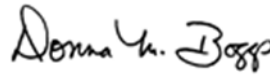
Roger Isom, President/CEO
California Cotton Ginners and Growers Association



Bill Mattos, President
California Poultry Federation



David Pruitt, Interim CEO/Ambassador
California Cut Flower Commission



Donna Boggs, Associate Director
California Seed Association



Jim Houston, Administrator
California Farm Bureau Federation



Brent Ashurst, President
California State Beekeepers Association



Ian LeMay, President
California Fresh Fruit Association



Ann Quinn, Executive Vice President
California State Floral Association



Chris Zanobini, Chief Executive Officer
California Grain and Feed Association



Rick Tomlinson, President
California Strawberry Commission



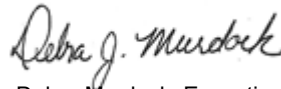
Debra Murdock, President
California Pear Growers Association



Darren Barfield, President
California Sweetpotato Council



Mike Montna, President/CEO
California Tomato Growers Association



Debra Murdock, Executive Director
Pacific Egg and Poultry Association



Ann Quinn, Executive Vice President
California Warehouse Association



Chris Zanobini, President
Plant California Alliance



Joani Woelfel, President & CEO
Far West Equipment Dealers Association



Kirti Mutatkar, President/CEO
United Ag




Christopher Valadez, President
Grower-Shipper Association of Central California



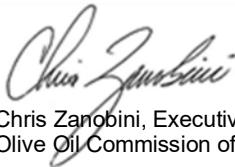
Roger Isom, President/CEO
Western Agricultural Processors Association



Claire Wineman, President
Grower-Shipper Association of Santa Barbara and San
Luis Obispo Counties



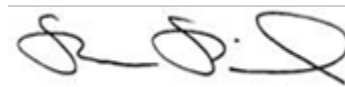
Matthew Allen, Director, California Government Affairs
Western Growers Association



Chris Zanobini, Executive Director
Olive Oil Commission of California



Chris Zanobini, Executive Officer
Pacific Coast Rendering Association



Renee Pinel, President/CEO
Western Plant Health Association

cc: Secretary Karen Ross, California Department of Food and Agriculture

Attachment: Coalition Letter to POTUS re. Federal Rulemaking Delay Request dated March 20, 2020



THE UNITED STATES
CONFERENCE OF MAYORS



March 20, 2020

President Donald J. Trump
The White House
1600 Pennsylvania Avenue, N.W.
Washington, D.C. 20500

Dear Mr. President:

On behalf of the nation’s states, cities, and counties, we write to request a formal pause, beginning on March 11, for all open public comment periods concerning both active rulemakings and non-rulemaking notices across every federal department or agency. State and local government policymakers’ thoughtful input into proposed federal agency actions is a vital component of our democratic system and provides federal agencies with much-needed perspectives and potential impacts of federal actions.

We recognize that our members are facing massive challenges in responding to, and as a result of, this global pandemic. At present, regulations.gov acknowledges nearly 700 open comment periods that will close in the next 30 days and more than 1000 over the next 90 days. Regulations.gov stated vision of its eRulemaking Program is “to enable the public ease of access to participate in a high quality, efficient, and open rulemaking process.” The extreme impact on normal working and living conditions will impair the ability of not only state and local officials, but also the general public, issue experts and others to provide thoughtful and meaningful participation and involvement in potential federal government actions that directly affect millions of people.

Consistent and meaningful engagement and consultation between intergovernmental partners is vital in the development and implementation of effective policies, programs and regulations. Therefore, state and local governments urge you to extend agency comment periods for a reasonable period of time, which will allow our state and local policymakers to focus on addressing the nation’s immediate pandemic response needs and ensure their ability to devote proper consideration of agency regulations. Thank you for your consideration.

Most respectfully,

National Governors Association
National Conference of State Legislatures
The Council of State Governments
National Association of Counties
National League of Cities

The United States Conference of Mayors
Government Finance Officers Association
International City/County Management Association
National Association of State Auditors, Comptrollers
and Treasurers