



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

March 20, 2020

Dear Governor Newsom:

As you lead California through the COVID-19 emergency, we wish to express our gratitude to you and Secretary Ross for ensuring that our state's great farmers and their essential business partners are recognized for the fundamental role they play during this national emergency.

On their behalf, I request that you initiate a formal pause, beginning March 23, for all open public comment periods concerning both active rulemakings and non-rulemaking (e.g., informal stakeholder) processes that affect agriculture. 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.


Agriculture and food production have been deemed an "essential activity" during the national emergency by both the federal and state governments, and California's agricultural sector is solely focused on ensuring the availability of safe and affordable food for our citizens. However, our members are confronted by labor issues caused by reductions on H-2A processing, supply chain disruptions, concerns among our workers, and a host of other challenges created by the COVID-19 crisis.

At the same time, state agencies like CARB, the regional water boards and others are continuing to advance complex new regulatory processes unrelated to the national emergency. This is simply not the time to add to the intense burdens farmers are facing.

We therefore request that you issue an Executive Order directing state agencies to temporarily halt regulatory proposals affecting agricultural operations that have not already been approved by the California Office of Administrative Law.

Please be assured that we understand the importance of the public policy matters inherent in the regulatory proceedings that would be paused. It is our sincere belief that we will all be better served by the thoughtful and meaningful engagement that can only occur once this national emergency has passed.

I am available at any time to discuss this request, and I am grateful for your consideration.

Sincerely,  
  
Dave Puglia  
President and CEO  
Western Growers

Cc: Secretary Ross, CDFA