



## **SACRAMENTO VALLEY**

### **Agricultural Commissioners and Sealers Association**

*Alpine Amador Butte Calaveras Colusa El Dorado Glenn Nevada  
Placer Sacramento Solano Sutter Tuolumne Yolo Yuba*

October 6, 2010

Kristin Macey, County/State Liaison  
California Department of Food and Agriculture  
1220 N Street  
Sacramento, CA 95814

Re: Notice of Proposed Rulemaking to amend Sections 105 and 108 of Title 3, of the California Code of Regulations (CCR).

Ms. Macey,

On behalf of the Sacramento Valley Agricultural Commissioners and Sealers Association (SVACASA), I want to express our strong support for the California Department of Food and Agriculture (Department) proposal to amend Sections 105 and 108 of Title 3, of the California Code of Regulations (CCR).

The shift to consolidate regulatory functions of Agricultural Commissioner with Weights and Measures departments has created a need to realign the duties of Inspector / Biologist staff. As consolidation occurred, the need resulted to hire employees who meet qualifications to perform both agricultural and weights and measures duties.

The proposed amendments will more closely align minimum qualifications for both the Agricultural Biologist and Weights and Measures Inspector licensing examinations in the educational categories and allow departments to hire people who can meet those qualifications and perform the duties of both. The proposed amendments will also help keep an adequate candidate pool of entry level County Inspector / Biologists in pace with recruitment needs.

The proposed changes to Sections 105 and 108 of the CCR will provide added consistency to the certification and hiring process between these two major areas and are fully supported by our area group association.

Sincerely,

A handwritten signature in blue ink, appearing to read "Louie B. Mendoza Jr.", is written over a horizontal line.

Louie B. Mendoza Jr.  
Chairman – SVACASA

~ SCACASA ~  
**SOUTHERN CALIFORNIA**  
**AGRICULTURAL COMMISSIONERS AND SEALERS ASSOCIATION**  
Imperial Inyo-Mono Los Angeles Orange Riverside San Bernardino San Diego San Luis Obispo Santa Barbara Ventura

October 12, 2010

Kristin Macey, County/State Liaison  
California Department of Food and Agriculture  
1220 N Street  
Sacramento, CA 95814

Re: Notice of Proposed Rulemaking to amend Sections 105 and 108 of Title 3, of the California Code of Regulations (CCR).

Ms. Macey,

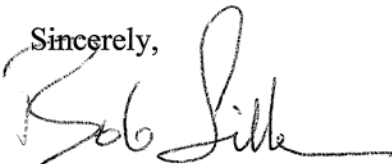
On behalf of the Southern Agricultural Commissioners and Sealers Association (SCACASA), I want to express our strong support for the California Department of Food and Agriculture (Department) proposal to amend Sections 105 and 108 of Title 3, of the California Code of Regulations (CCR).

The consolidation of Agricultural Commissioner and Weights and Measures departments has created staffing challenges related to the minimum qualifications of required licenses. The proposed changes allow for greater flexibility in cross utilization of staff in both programs.

The proposed amendments will more closely align minimum qualifications for both the Agricultural Biologist and Weights and Measures Inspector licensing examinations in the educational categories and allow departments to hire people who can meet those qualifications and perform the duties of both. The proposed amendments will also help keep an adequate candidate pool of entry level County Inspector/Biologist in pace with recruitment needs.

The proposed changes to Sections 105 and 108 of the CCR will provide added consistency to the certification and hiring process between these two major areas and are fully supported by our area group association.

Sincerely,



Bob Lilley  
Chairman-SCACASA



# Regional Association of Northern Counties Agricultural Commissioners and Sealers

Del Norte • Humboldt • Lake • Lassen • Mendocino • Modoc  
Plumas/Sierra • Shasta • Siskiyou • Tehama • Trinity

October 18, 2010

Kristen Macey, County/State Liaison  
California Department of Agriculture  
1220 N Street  
Sacramento, CA 95128

SENT VIA EMAIL

Dear Ms. Macey:

The Regional Association of Northern Counties Agricultural Commissioners and Sealers Association supports the rulemaking changes proposed for California Code of Regulations Sections 105 and 108.

Adoption of the proposed rule change would:

- Expand the pool of candidates from which commissioners and sealers may consider filling permanent departmental positions,
- Accommodate and facilitate program efficiencies and technologies being adopted by county commissioners/sealers,
- Ensure full access and participation in the commissioner/sealer system by all county commissioners/sealer program staff,
- Enhance employee retention and facilitate departmental succession.

As currently written, CCR sections 105 and 108 restricts the pool of candidates allowed to sit for State Agriculture and Weights and Measures licensing exams to those possessing Bachelors of Science degrees in agricultural, biological or physical sciences. Because staff working for the County Agricultural Commissioner and Sealer of Weights and Measures must obtain these licenses to enforce State agriculture and weights and measures regulations, the State exam qualifications become the qualifications county commissioners/sealers use when hiring staff. Unfortunately, the pool of qualified, quality candidates who meet the current qualifications set by CCR 105 and 108 is shrinking, but adoption of the proposed rule change would increase the number of qualified candidates.

As county commissioner/sealers have developed new tools and adopted emergent technologies, there is a need for a diverse staff with a broad range of abilities and expertise - the development and incorporation of GIS and other information technologies into departmental programs would be an example of such need, as well as the continuing need for staff with rigorous writing, analytical and critical thinking skills. Allowing individuals with degrees other than agriculture, biology, or a physical science to take the State licensing exams would allow county commissioners and sealers the flexibility to consider hiring candidates who have specialized degrees and therefore can both address

specialized departmental needs and also become qualified to assist in traditional agriculture/weights and measures program enforcement.

For staff working for county commissioner /sealer who do not have a degree in agriculture, biology or physical sciences, the current version of CCR 105 and 108 serves not only as a barrier to working independently in traditional agriculture/weights and measures programs, but it also restricts upward mobility in the department and eliminates any option to pursue positions of leadership such as Deputy or Commissioner/Sealer. Such employees would also be excluded from full participation in California's Agricultural Commissioner / Sealer of Weights and Measures system.

The proposed rule making changes to CCR 105 and 108 would facilitate flexibility concerning program staffing and allow all employees working in county commissioner/sealer offices equal opportunities for advancement and participation. These elements are important as they ensure retention of highly trained and valued staff, facilitate departmental job succession, provide for program continuity, and preserves institutional memory.

If you have any questions concerning these comments, please contact Mary Pfeiffer, Agricultural Commissioner/Sealer of Weights and Measures for Shasta County. Mary is currently serving as the Chair for the Regional Association of Northern Counties Agricultural Commissioner and Sealers association.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary Pfeiffer".

MARY PFEIFFER  
Chair, NCACS





# COAST



## AGRICULTURAL COMMISSIONERS AND SEALERS ASSOCIATION

Alameda – Contra Costa  
San Benito – San Francisco – Sonoma

Marin - Monterey – Napa  
San Mateo – Santa Clara – Santa Cruz

October 18, 2010

Kristin Macey, County/State Liaison  
California Department of Food and Agriculture  
1220 N Street  
Sacramento, CA 95814

Re: Proposed rulemaking changes for California Code of Regulations Sections 105 and 108;  
minimum qualifications.

The Coast Agricultural Commissioners and Sealers Association supports the rulemaking changes proposed for California Code of Regulations Sections 105 and 108.

Adoption of the proposed rule change would:

- Expand the pool of candidates from which commissioners and sealers may consider filling permanent departmental positions,
- Accommodate and facilitate program efficiencies and technologies being adopted by county commissioners/sealers,
- Ensure full access and participation in the commissioner/sealer system by all county commissioners/sealer program staff,
- Enhance employee retention and facilitate departmental succession.

As currently written, CCR sections 105 and 108 restricts the pool of candidates allowed to sit for State Agriculture and Weights and Measures licensing exams to those possessing Bachelors of Science degrees in agricultural, biological or physical sciences. Because staff working for the County Agricultural Commissioner and Sealer of Weights and Measures must obtain these licenses to enforce State agriculture and weights and measures regulations, the State exam qualifications become the qualifications county commissioners/sealers use when hiring staff. Unfortunately, the pool of qualified, quality candidates who meet the current qualifications set by CCR 105 and 108 is shrinking, but adoption of the proposed rule change would increase the number of qualified candidates.

As county commissioner/sealers have developed new tools and adopted emergent technologies, there is a need for a diverse staff with a broad range of abilities and expertise - the development and incorporation of GIS and other information technologies into departmental programs would be an example of such need. Allowing individuals with degrees other than agriculture, biology, or a physical science to take the State licensing exam, would allow county commissioners and sealers the flexibility to consider hiring candidates who have specialized degrees and therefore

can both address specialized departmental needs and also become qualified to assist in traditional agriculture/weights and measures program enforcement.

For staff working for county commissioner /sealer who don't have a degree in agriculture, biology or physical sciences, the current version of CCR 105 and 108 serves not only as a barrier to working independently in traditional agriculture/weights and measures programs, but it also restricts upward mobility in the department and eliminates any option to pursue positions of leadership such as Deputy or Commissioner/Sealer. Such employees would also be excluded from full participation in California's Agricultural Commissioner / Sealer of Weights and Measures system.

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Thank you for this opportunity to comment.

Sincerely,



Vincent L. Guise  
Chair, Coast Area Group of CACASA





# SAN JOAQUIN VALLEY

## AGRICULTURAL COMMISSIONERS AND SEALERS ASSOCIATION

FRESNO•KERN•KINGS•MADERA•MARIPOSA•MERCED•SAN JOAQUIN•STANISLAUS•TULARE

October 28, 2010

Kristin Macey, County/State Liaison  
California Department of Food and Agriculture  
1220 N Street  
Sacramento, CA 95814

Mrs. Macey:

Please regard this letter as the unanimous endorsement and support from the San Joaquin Valley Agricultural Commissioners and Sealers Association (SJVACASA) for the proposed amendment to California Code of Regulations Title 3, Sections 105 and 108, and commensurate Rulemaking.

We are in agreement that the changes being proposed offer a better opportunity for expansion of the pool of qualified applicants from which commissioners and sealers may draw to fill vacant licensed positions. The changes offer the ability to potentially hire employees with the type of educational background who may be able to better assist with the program efficiencies and technologies being adopted by Ag Commissioners and Sealers.

Current regulations (105 & 108) were drafted at a time when more of the county departments were not combined, as they are now. We feel these new regulations will provide the needed flexibility to assist counties in finding and hiring employees who possess education in disciplines suitable in addressing the complex regulatory environment that interfaces with our agricultural industry as well as weights and measures.

On behalf of SJVACASA I want to express to you our appreciation for all of the help you have provided to CACASA with this endeavor.

Sincerely,

Gary Caseri  
Chair, SJVACASA