



October 16, 2021

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: 2022 Scoping Plan Update

Dear Members of the California Air Resources Board:

Thank you for the opportunity to comment on the California Air Resources Board (CARB) 2022 Scoping Plan. Western Plant Health Association (WPH) appreciates the efforts of the Board and staff in developing a scoping plan that will meet the challenges of sound climate change policy. WPH represents the interests of pesticide and fertilizer manufacturers, agricultural retailers and agricultural biotechnology providers in California, Arizona, and Hawaii. WPH offers the following thoughts.

California is already on the forefront of pro-active climate change policies related to pesticides. The California Department of Pesticide Regulations (DPR) establishes science-based pesticide emission standards that assure pesticides can only be used if they meet California's State Implementation Plans for air quality. This process has been in-effect for over two decades with DPR and CARB continuously monitoring pesticides for Volatile Organic Compounds (VOC), which could impact ozone levels and contribute to climate change. DPR annually establishes application use levels that limits the use of pesticides, so they do not contribute to climate change. DPR also ready establishes safe use levels for pesticides to protect human health and environmental safety. These regulations assure environmental protection, while assuring that the important need of protecting farmland is maintained.

Farmland, and the trees and plants grown on it, naturally protect the environment. Farms passively consume harmful carbon in the atmosphere and convert it into oxygen. In California, this means farmland removes thousands of tons carbon from the air every year, significantly reducing greenhouse gases (GHG).

But farms need support to survive. The State of California recognizes this. "If we are to depend on agricultural lands for food and fiber benefits as well as carbon sequestration and storage, **it is important that farming and ranching remain robust** and that rates of conversion (to urbanization and other uses) diminish," according to the draft *California 2030 Natural + Working Lands Climate Change Implementation Plan* created by the state's policymakers.

This is especially urgent because farmland is endangered and disappearing at the alarming rate of 50,000 acres a year. That's equivalent to 78 square miles, 12 Yosemite Valleys or 38,000 football fields.

To survive, healthy farms require the ongoing relief offered by advanced nutrition for plants and innovative and environmentally friendlier protections against harmful weeds, insects, worms, and bacteria that destroy crops.

We can help reverse climate change if we can reverse the problem of disappearing farmland if we remember this simple equation:

- Advanced Crop Nutrition & Protection = Hardy Plants
- Hardy Plants = Healthy Farms
- Healthy Farms = More Green Space
- More Green Space = Carbon Reduction
- Carbon Reduction = Healthier Planet

Clearly, Californians should protect farmland as a precious environmental resource if we as a society are going to reverse climate change in a meaningful way.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Pinel', with a stylized flourish at the end.

Renee Pinel
President/CEO