



Californians For  
Pesticide Reform



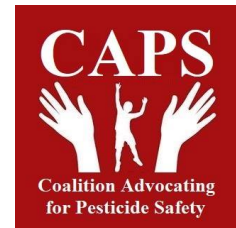
CEH  
center for environmental health



Central California  
Asthma Collaborative



FOOD  
EMPOWERMENT  
PROJECT  
*Because your food choices can change the world*



Friends of  
the Earth



NRDC  
NATURAL RESOURCES  
DEFENSE COUNCIL



Physicians for  
Social Responsibility  
Los Angeles





Environmental Justice

Citizen Science Investigations

FPK



FIBERSHED



CA·NURSES  
FOR ENVIRONMENTAL HEALTH & JUSTICE



March 4, 2022

California Air Resources Board

1001 I Street, Sacramento, CA 95814

P.O. Box 2815, Sacramento, CA 95812

Submitted electronically at:

<http://www.arb.ca.gov/lispub/comm/bclist.php>

To the California Air Resources board and staff:

Thank you for the opportunity to comment on the Draft 2022 State Strategy for the State Implementation Plan January 31, 2022 (SIP). The following 50 community-based, environmental health and justice, air quality, labor, public health, environmental, and sustainable agriculture groups submit these comments for your consideration.

We strongly support the inclusion in the SIP of a regulatory strategy in partnership with the Department of Pesticide Regulation (DPR) to reduce Reactive Organic Gas (ROG) emissions from agricultural pesticide use in California, with a particular emphasis on creating a regulatory framework to establish and attain ambitious pesticide use reduction targets. DPR has not updated its commitment to reduce ROG emissions since the 1994 SIP, when the regulatory target was 80ppb.

We recommend that the SIP include a meaningful target to reduce ROG emissions from pesticides and that CARB staff begin modeling pesticide ROG emissions and their contribution to ozone.

The proposed draft includes the following language on p.27:

“Pesticides are used in commercial and agricultural operations across the State and are a source of ROG and other types of emissions. This measure would involve CARB working with the California Department of Pesticide Regulation (DPR) to develop new regulations to further reduce ROG emissions from commercial and agricultural pesticides used in California through reformulation, reduced usage, and innovative technologies and practices.

CARB staff is coordinating with the Department of Pesticide Regulation and continuing to explore this suggested measure; it may or may not ultimately be included in the 2022 State SIP Strategy, or included in the form described here.”

Our specific recommendations for wording changes in the second paragraph are as follows:

“CARB staff is coordinating with the Department of Pesticide Regulation and will request that DPR complete a strategy by the end of 2023 for reducing ROG emissions by 75% from 2020 levels in high pesticide use air basins by 2037. CARB will request that the strategy include the following tactics: reduced usage, reformulation, innovative technologies and agroecological practices.”

We also recommend that CARB model pesticide ROG emissions and their contribution to ground-level ozone.

These recommendations are crucial for the following five reasons:

- 1. Ozone nonattainment areas include counties with high pesticide use.**

CARB has identified ten areas in California that will need to develop a state implementation plan because they are moderate to extreme nonattainment areas



for the 2015 70 ppb ozone standard. One of the “extreme” areas is the San Joaquin Valley. The eight counties that make up the San Joaquin Valley Area are the eight counties with the highest pesticide use in California, totaling over 130 million pounds annually. Ventura County (identified as “serious” nonattainment) is also a high pesticide use county (over six million pounds annually).

**2. According to CARB, VOCs are an important precursor, or component in the formation of ground level ozone. Pesticides are an important source of VOCs.**

DPR’s most recent annual report about VOC emissions concludes that emissions of VOCs in the San Joaquin Valley from pesticides are over 16 tons per day. In Ventura County emissions are over one ton per day.

**3. Adding pesticide use to the state strategy helps CARB achieve the agency’s environmental justice goals.**

Six of the eight counties in the San Joaquin nonattainment area are [majority Latinx](#)<sup>1</sup>. In addition, pesticide use has been included as an important indicator in California’s mapping tool to identify where people are especially vulnerable to pollution (CalEnviroScreen). Researchers at the California Environmental Protection Agency found that pesticides were the pollutants with the [greatest racial and income disparities](#)<sup>2</sup> in the state. Almost all pesticides used in the state were in the California zip codes with the highest proportion of people of color.

**4. Pesticide use is a state-regulated activity, and therefore one that can be addressed in the state strategy.**

The draft strategy notes that federally regulated emissions of NOx exceeded state regulated sources in 2020, and are expected to be double state regulated emissions by 2030. This limits CARB’s ability to reduce ozone levels by continuing to reduce NOx emissions. Requiring pesticide reduction strategies increases the ability of California to reduce ozone levels through state action.

**5. Reducing pesticide VOC emissions can also help meet CARB’s carbon neutrality goals.**

One statewide strategy for reducing pesticide VOC emissions is increasing certified organic acreage. Organic growers use fewer pesticides, and organic practices build healthy soil. At UC Davis’s Russell Ranch, a long-term comparison of organic and conventional cropping systems found that the organic

---

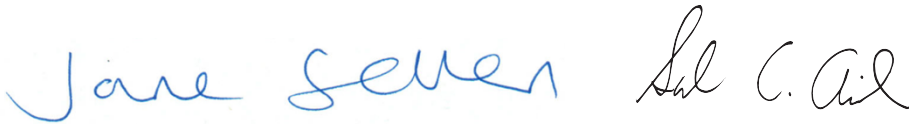
<sup>1</sup> <https://www.indexmundi.com/facts/united-states/quick-facts/california/hispanic-or-latino-population-percentage#map>

<sup>2</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4605180/>

system [sequestered significantly more soil carbon](#)<sup>3</sup> than any of the other systems studied. Therefore, reducing VOC emissions through reducing pesticide use via organic agriculture adoption can have the added benefit of significant soil carbon sequestration.

Thank you for your consideration of our comments.

Sincerely,

Handwritten signatures of Jane Sellen and Sarah C. Aird in blue ink.

Jane Sellen and Sarah Aird, Co-Directors  
**Californians for Pesticide Reform**

Michael Green, CEO  
**Center for Environmental Health**

Paulina Torres, Staff Attorney  
**Center on Race, Poverty and the Environment**

Catherine Garoupa White, Executive Director  
**Central Valley Air Quality Coalition**

Gary Hughes, California Policy Monitor  
**Biofuelwatch**

Thomas Helme, Coordinator  
**California Environmental Justice Coalition (CEJC)**

Barbara Sattler, Leadership Council  
**California Nurses for Environmental Health and Justice**

Anne Katten, Pesticide and Work Health and Safety Specialist  
**California Rural Legal Assistance Foundation**

Jonathan Evans, Environmental Health Legal Director  
**Center for Biological Diversity**

Dr. Ann Lopez, Executive Director  
**Center for Farmworker Families**

Kevin Hamilton, Co-Executive Director  
**Central California Asthma Collaborative**

---

<sup>3</sup> <https://calag.ucanr.edu/archive/?type=pdf&article=ca.2017a0022>

Nayamin Martinez, Executive Director  
**Central California Environmental Justice Network**

Sarait Martinez, Executive Director  
**Centro Binacional para el Desarrollo Indígena Oaxaqueño**

Cathryn Couch, CEO  
**Ceres Community Project**

Ken Szutu, Executive Director  
**Citizen Air Monitoring Network**

Jesus Alonso, Kern Community Organizer  
**Clean Water Action**

Maria Reyes, President  
**Coalition Advocating for Pesticide Safety – Tulare County**

Nichole Warwick, Leadership Institute Programs Manager  
**Daily Acts**

Jan Dietrick, Executive Director  
**Dietrick Institute for Applied Insect Ecology**

Catherine Dodd, Ph.D., RN, Policy Advisor  
**Families Advocating for Chemical and Toxics Safety - FACTS**

Dr. Astrid M. Calderas, Executive Director  
**Flight Pattern Kids - Environmental Health Research Group FPK -  
Environmental Justice Investigations**

Rebecca Burgess, Executive Director  
**Fibershed**

Liat Meitzenheimer, President  
**Fresh Air Vallejo**

Ronald J. Martin, Ph.D., President  
**Fresnans against Fracking**

Lauren Ornelas, Founder  
**Food Empowerment Project**

Lisa Archer, Director, Food and Agriculture Program  
**Friends of the Earth U.S**

Kimberly McCoy, Project Director  
**Fresno Building Healthy Communities**

Bradley Angel, Executive Director  
**Greenaction for Health and Environmental Justice**

Catherine Dodd, Ph.D. RN, Policy Advisor  
**Healing the Health System**

Lourdes Herrera, Director  
**Madera Coalition for Community Justice**

Cesar Lara, Executive Director  
**Monterey Bay Central Labor Council**

Miriam Rotkin-Ellman, Senior Scientist/Director of Toxics  
**Natural Resources Defense Council (NRDC)**

Eli Tizcareño & Hektor Calderon, CA Campaigns Director & CA Organizer  
**National Young Farmers Coalition**

Kim Konte, Founder  
**Non-Toxic Neighborhoods**

Margaret Reeves, Senior Scientist  
**Pesticide Action Network**

Martha Dina Arguello, Executive Director  
**Physicians for Social Responsibility – Los Angeles**

Oussama Mokeddem, Director of State Policy  
**Public Health Advocates**

Ron Whitehurst, Owner/Pest Control Advisor  
**Rincon-Vitova Insectaries, Inc.**

Yanely Martinez, Monterey County Organizer  
**Safe Ag Safe Schools – Monterey Bay**

Miriam Limov, Farm Institute Associate  
**Sierra Harvest**

Keith Schildt Chair, Legislative Policy Committee  
**Slow Food California**

Megan Kaun, Director  
**Sonoma Safe Ag Safe Schools**

Sibella Kraus, President  
**Sustainable Agriculture Education**

Ellie Cohen, CEO  
**The Climate Center**

Xavier Morales, Executive Director  
**The Praxis Project**

Marylia Kelley, Executive Director  
**Tri-Valley Cares**

Bianca Lopez, Co-Founder/Project Director  
**Valley Improvement Projects (VIP)**

Jan Dietrick, Policy Team Leader  
**350 Ventura County Climate Hub**

Teresa Gomez, Organizer  
**Ventura County Coalition Advocating for Pesticide Safety**

Janice Schroeder, Core Member  
**West Berkeley Alliance for Clean Air and Safe Jobs**