



Californians For
Pesticide Reform

November 19, 2020

Via Online Submission

Mary Nichols, Chair
California Air Resources Board

Re: Adding Agricultural Sources to Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants

Dear Chair Nichols,

We are submitting this comment letter on behalf of the statewide coalition Californians for Pesticide Reform (CPR), which works directly with farmworker and agricultural communities on the frontlines of pesticide exposure. We are writing to offer our comments on the proposed amendments to the "Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants."

Include Agricultural Sources

CPR asks the CARB Board to direct staff to include all Criteria Pollutants and Toxic Air Contaminants that communities actually face and not exclude important sources - particularly agricultural sources - from the statewide inventory tools. This is especially important in order for CARB to be able to fully and properly implement AB 617, which includes pesticide TACs.

Altogether 47 pesticide TACs are used in California, with annual total usage of approximately 45 million pounds. California communities deserve data systems and assessment methods that take account of the pollution burden that they face rather than institutional turf. The CTR rule adds agricultural exclusions and does not address this concern. Rather, coordination with other parts of CalEPA would be appropriate.

CARB's resolution adopting the Shafter CERP includes language acknowledging CARB's jurisdiction over pesticide TACs: ". . . some pesticides are also classified as TACs and so can be regulated as a TAC, and as smog-forming compounds as they become waste gases outside of their pesticidal use; State law establishes a system of overlapping authorities between pesticide and air regulators to address these complex problems."

It is critical that these agricultural pollutants be included in CARB state inventory systems in order to support CARB's implementation of emission reductions according to key state mandates such as AB 617.

Sincerely,

Sarah C. Aird and Jane Sellen
Californians for Pesticide Reform