

From: [ARB Clerk of the Board](#)
To: [Bechtold, Bradley@ARB](mailto:Bechtold_Bradley@ARB)
Subject: FW: Public Comment on Scoping Plan
Date: Thursday, December 15, 2022 10:36:10 AM

Katie Estabrook

Manager
Board Administration & Regulatory Coordination Unit
Executive Office
[she/her/hers](#)
VoIP: 279-208-7745

From: Mark Weller <mark@pestidereform.org>
Sent: Thursday, December 15, 2022 10:03 AM
To: ARB Clerk of the Board <cotb@arb.ca.gov>
Subject: Public Comment on Scoping Plan

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I'm sorry, but I tried to submit comments through the web form, but it didn't work, so here are my comments.

Dear California Air Resources Board Members:

It is important to communities like mine, an agricultural region in Santa Cruz County, to have organic farming increases and pesticide reductions included in the Scoping Plan. Thank you to CARB for supporting this and I would like to see even stronger measures adopted.

My concerns are that

- 1) pesticides do contribute to greenhouse gas emissions.
- 2) pesticide use has a disproportionate impact on low-income communities of color; and
- 3) while we do need more research, there is enough research available now to justify stronger support for pesticide use reduction, agroecology and diversified organic agriculture as greenhouse gas reduction and climate change mitigation strategies, especially in light of the particularly harmful and well-documented health impacts of pesticides on communities of color in ag areas.

I would like to see the following in the Scoping Plan:

- 1) Strengthen the organic farming target by increasing to 30% of all acreage organically-farmed by 2030.
- 2) Exclude pesticide use from the Scoping Plan as a climate-smart strategy.

- 3) Remove implications in the Scoping Plan that the climate-smart agricultural practices (such as cover crops) included in the modeling would inherently result in synthetic pesticide reductions, and instead include pesticide reductions as an actual goal instead of as an incidental byproduct of other practices.
- 4) Ensure that the further research on pesticides and climate change includes additional research into the disparate impacts of pesticide use.
- 5) Support deployment of direct incentives to farmers to reduce pesticide use, similar to financial mechanisms for healthy soils practices and organic agriculture.

Sincerely,

Mark Weller
Santa Cruz
831-325-1681

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Mark Weller
Californians for Pesticide Reform
931 E Market St., Salinas CA 93905
831-325-1681

mark@pesticidereform.org

www.pesticidereform.org

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