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**From:** Robina <robinasuwol@earthlink.net>  
**Sent:** Monday, March 25, 2019 5:06 PM  
**To:** ARB Criteria & Toxics Regulation Reporting  
**Subject:** Re: INVENTORY REPORTING RULE

Dear California Air Resources Board,

California Safe Schools (CSS) is a children's environmental health and environmental justice coalition founded in 1998.. CSS achieved national prominence by spearheading the Los Angeles Unified Integrated Pest Management (IPM) Policy, the most stringent pesticide policy in the nation for K-12 public schools and the first to embrace the "Precautionary Principle" and "Right to Know". The success of the policy led to California's Healthy Schools Act. Today the LA Unified IPM policy serves as an international model for school districts and communities.

On October 6, 2005, Governor Schwarzenegger signed AB 405 (Montanez) sponsored by California Safe Schools. The bill bans experimental pesticides, whose health effects are unknown, from California k-12 public schools. As a result, more than 6 million California children and hundreds of thousands of school children are protected from experimental chemicals, whose health effects are unknown.

Please kindly consider our comments that were made at the CARB public meeting held in Los Angeles and stated again below:

1)It is imperative that all sources that are known to CARB and the districts be included in the initial reporting for 2019 due in 2020.

2)California Safe Schools has been involved with extensive Groundtruthing in both the City of Paramount and Van Nuys California. We found that countless sources were identified in our Groundtruthing efforts that were not known to the air districts. We are respectfully requesting, that there be a mechanism to keep track of all facilities identified through Groundtruthing and they be added to the inventory and reporting requirements.

3)Pesticides must be added to the inventory for the assessment of cumulative impacts. While pesticides are a significant source of toxic emissions in agricultural areas, they are also being used in areas throughout California. While we are aware that some pesticides are already designated, we're requesting that CARB ensure that pesticides from stationary sources be added to the reporting requirements & inventory

4)We appreciate that the March 2019 Proposal now includes: Reporting should be required annually to allow for assessments over time & the rule will not contain any exit provisions.

5)We need consistent, complete and accurate information to track changes in emissions over time-especially if there are any increases or disproportionate changes in highly impacted communities. This is mandated in AB617 –AB 197, California climate change and air quality laws, CalEPA policies for environmental justice.

Respectfully,

Robina Suwol  
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