
CPR
Californians For
Pesticide Reform


CRPE


CVAQ
CENTRAL VALLEY AIR QUALITY COALITION • COALICIÓN DE CALIDAD DEL AIRE DEL VALLE CENTRAL


CEH
center for environmental health

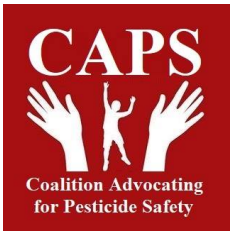

CCAC
Central California
Asthma Collaborative


CCEJN
Central California
Environmental Justice Network


Food
Empowerment
Project
Because your food choices can change the world


CENTER FOR
FARMWORKER FAMILIES


CENTER for
BIOLOGICAL
DIVERSITY
Because life is good.


CAPS
Coalition Advocating
for Pesticide Safety


California
Environmental
Justice
Coalition
CEJC


California Rural Legal Assistance Foundation
Advocates For Justice


CENTRO BINACIONAL PARA EL DESARROLLO INDÍGENA OAXAQUEÑO
Binational Center for the Development
of Oaxacan Indigenous Communities


DIETRICK
INSTITUTE
Applied Insect Ecology


FACTS
Families Advocating for Chemical
& Toxics Safety
A project of
Center for Environmental Health


Friends of
the Earth


NRDC
NATURAL RESOURCES
DEFENSE COUNCIL


NON·TOXIC NEIGHBORHOODS


PSR LA
Physicians for
Social Responsibility
Los Angeles


Rincon-Vitova
Insectaries, Inc.
Biological Solutions for Pest Management


SAFE AG
SAFE SCHOOLS


SIERRA HARVEST


MADERA COALITION for COMMUNITY JUSTICE
educate | organize | empower


Slow Food
CALIFORNIA


SASS
Safe Agriculture
Safe Schools


PUBLIC HEALTH
ADVOCATES


Ceres
COMMUNITY
PROJECT


GREENACTION
for Health & Environmental Justice


daily acts
every action makes a ripple


FRESNANS AGAINST
FRACKING
NO FRACKING


BuildingHealthyCommunities
FRESNO


V.I.P.
VALLEY IMPROVEMENT PROJECTS
FOR SOCIAL & ENVIRONMENTAL JUSTICE


the praxis project


NATIONAL
YOUNG
FARMERS
COALITION
EST 2010


biofuelwatch



Environmental Justice

Citizen Science Investigations

FPK





















March 4, 2022

California Air Resources Board

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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 52 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[1]. 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[2] 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

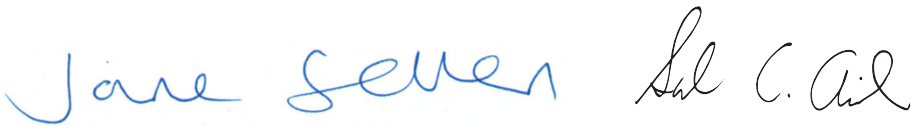
[1] https://www.indexmundi.com/facts/united-states/quick-facts/california/hispanic-or-latino-population-percentage#map

[2] https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4605180/

comparison of organic and conventional cropping systems found that the organic system sequestered significantly more soil carbon[3] 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,



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[3] https://calag.ucanr.edu/archive/?type=pdf&article=ca.2017a0022

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