

PESTICIDES MUST BE INCLUDED IN SCOPING PLAN AND CLIMATE LANDS STRATEGY





OCCIDENTAL ARTS & ECOLOGY CENTER



To: Liane Randolph, Chair
California Air Resources Board

Via [online portal](#)

Re: Pesticides must be included in the 2022 Scoping Plan

The 54 organizations below submit this letter to call for the explicit inclusion of agricultural pesticides in the 2022 Scoping Plan, along with actions to support reductions of synthetic pesticide use. We also call for the Department of Pesticide Regulation to take a lead role in these efforts.

Reducing use of pesticides would achieve many of the goals of the 2022 Scoping Plan, which is intended not only to identify measures to decrease greenhouse gas emissions and increase carbon sequestration but also to prioritize actions that result in multiple benefits to public health and the environment.

Pesticide use in California Poses a Severe Threat to Human and Environmental Health, with Disproportionate Health Harms to Communities of Color:

- They pollute air and water and impact communities, putting the health of Latinx and farmworker communities at disproportionate risk. Roughly 20% of the 200+

million pounds of pesticides applied each year in California are known to cause cancer and many are linked to a variety of health impacts including asthma, autism, Parkinson's, and developmental and reproductive harms. Some are classified as Toxic Air Contaminants and Volatile Organic Compounds.

- They contribute significantly to greenhouse gas emissions, with studies showing just three fumigant pesticides leading to as much as a 100-fold increase in nitrous oxide, a greenhouse gas considered 300 times more potent than carbon dioxide. California uses 20 million pounds a year of these three fumigants. One study showed a 7-fold increase in nitrous oxide emissions following a single fumigation.
- They decrease ecological biodiversity and leave farmers less resilient in the face of climate change. Pesticides are one of the greatest causes of pollinator and biodiversity loss worldwide, with farming areas 48 times more toxic to honeybees and other organisms due to pesticides than they were 25 years ago.
- They are themselves petrochemicals, and their production is highly energy-intensive.

Organic Farming Free of Synthetic Pesticides and Fertilizers Better Sequesters Stable Soil Carbon:

- Organic practices increase the ability of soil to sequester carbon, build soil organic matter, and conserve water.
- Multiple meta-analyses comparing thousands of farms have shown that organic farming, which is virtually free of synthetic pesticides and fertilizers, results in higher stable soil organic carbon and reduced nitrous oxide emissions when compared to “conventional” farming reliant on synthetic chemicals.

For these reasons it is imperative that pesticides be incorporated into the Scoping Plan in a significant way, along with real solutions that decrease our overreliance on these hazardous chemicals. To address this issue head on, we believe the Department of Pesticide Regulation needs to play a leadership role as an equal partner, since only DPR can provide the regulatory framework necessary to reduce use. Pesticides must be recognized for their disproportionate and deleterious effect on climate change, human health and biodiversity, and solutions must be offered that focus on reducing their use.

The contribution of pesticides to GHG emissions must be measured:

We therefore urge CARB to:

- add pesticide impacts on greenhouse gas emissions and on the ability of the soil to sequester carbon to critical measurement tools for carbon, and
- align incentives to favor reduction of pesticides in light of climate and other harms.

State agencies and departments must work together to adopt solutions:

We urge CARB to counter the siloization that has kept pesticides out of prior scoping plans by coordinating efforts across agencies and departments to adopt the following solutions to help move agriculture in California away from reliance on chemical pesticides:

- Identify a sustainable funding source to support agroecological and regenerative organic farming. All public funding, research and implementation support should be shifted away from chemical reliance to support agroecological and regenerative organic farming.
- Provide funding, technical assistance and other support to help California farmers transition off of agricultural pesticides to more ecological farming that focuses on prevention of pest and disease problems through plant and soil health and resilience.
- Subsidize transition to organic farming by covering expenses related to the development of organic plans, ensuring no farmer has to pay for organic certification or inspections.
- Establish scheduled public procurement goals, requiring government institutions such as public schools, hospitals, prisons, etc., to gradually increase the percentage of their purchases from organic farmers, especially small-and medium-sized and socially disadvantaged farmers, with a goal of 100% organic by 2040.
- Allocate resources for studying the long-term impacts of pesticides on human health in California agriculture.

Thank you for considering our comments.

Sincerely,

Paola Diaz
Food & Agriculture Program Associate
11th Hour Project

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

Leah Cohen
General Coordinator
Agricultural Justice Project

David Gassman
Co-Convenor
**Bay Area Systems Change not
Climate Change**

Catherine Dodd, RN, PhD
Policy Advisor
**California Alliance of Nurses for
Healthy Environments**

Jeanne Merrill
Policy Director
**California Climate & Agriculture
Network (CalCAN)**

Nan Wishner
Board Member
**California Environmental Health
Initiative**

Thomas Helme
Coordinator
**California Environmental Justice
Coalition**

Larry Hanson
Board President
California River Watch

Anne Katten
Pesticide & Work Safety Specialist
**California Rural Legal Assistance
Foundation**

Jane Sellen & Sarah Aird
Co-Directors
Californians for Pesticide Reform

Jonathan Evans
Environmental Health Legal Director
Center for Biological Diversity

Kathryn Alcantar
Policy Director
Center for Environmental Health

Caroline Farrell
Executive Director
**Center on Race, Poverty & the
Environment**

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

Maricela Morales
Executive Director
**Central Coast Alliance United for a
Sustainable Economy**

Dr. Catherine Garoupa White
Executive Director
Central Valley Air Quality Coalition

Dr. Sarait Martinez
Executive Director
**Centro Binacional para el Desarrollo
Indígena Oaxaqueño (CBDIO)**

Andria Ventura
Legislative and Policy Director
Clean Water Action

Renee Donato Nelson
President
Clean Air and Water Matter

Karina Maher
Physician
Climate Health Now

Melissa Sargent
Environmental Health Advocate
Ecology Center

Theodora Scarato
Executive Director
Environmental Health Trust

Thomas Wheeler
Executive Director
Environmental Protection Information Center

Bill Allayaud
California Director of Environmental Affairs
Environmental Working Group

Pastor Trena Turner
Executive Director
Faith in the Valley

Lendri Purcell
President
FACTS - Families Advocating for Chemical and Toxics Safety

Kendra Klein
Senior Scientist
Friends of the Earth

Arlene Blum
Executive Director
Green Science Policy Institute

Sheina Crystal
UC Campaign Coordinator
Herbicide Free Campus

Kimberly Baker
Executive Director
Klamath Forest Alliance

Julia Jordan
Policy Coordinator
Leadership Counsel for Justice & Accountability

Matt Holmes
Community Engagement Specialist
Little Manila Rising

Liana Orlandi
Steering Committee Chair
Marin Food Policy Council

Zen Honeycutt
Founding Executive Director
Moms Across America

Cesar Lara
Executive Director
Monterey Bay Central Labor Council

Roosevelt Tarlesson
Executive Director
National Economic and Social Development Action Committee

Lena Brook
Director of Food Campaigns
Natural Resources Defense Council

Frank Egger
President
North Coast Rivers Alliance

Dave Henson
Executive Director
Occidental Arts and Ecology Center

Asha Sharma
California Organizing Director
Pesticide Action Network

Julie M Royes
Founder
Pesticide Free RP

Virginia Souders-Mason
Executive Director
Pesticide Free Zone

Robert M. Gould, MD
President
**Physicians for Social Responsibility,
San Francisco Bay**

Padi Selwyn
Co-founder
Preserve Rural Sonoma County

Ron Whitehurst, PCA
Pest Control Advisor
Rincon-Vitova Insectaries, Inc.

Héctor Calderón
Community Organizer
Safe Ag Safe Schools

Ted Schettler MD, MPH
Science Director
**Science and Environmental Health
Network**

Megan Kaun
Co-Director
**Sonoma Safe Agriculture Safe
Schools**

Efrain Aguilera
Union Representative/Organizer
UFCW Local 5

Bianca Lopez
Project Director
Valley Improvement Projects

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

Dr. Elizabeth Dougherty
Executive Director
Wholly H2O

Janus Holt Matthes
Board Chair
Wine & Water Watch