



March 23, 2022

Chair Bill Quirk, Assembly Environmental Safety and Toxic Materials Committee

Chair Richard Bloom, Assembly Budget Subcommittee #3 on Climate Crisis, Resources, Energy and Transportation

Dear Asm Bloom, Asm Quirk and members of the Assembly ESTM and Budget Sub 3 Committees:

We are advocates for policies and public investments that prioritize environmental justice through appropriate regulation of toxic pesticides and which also protect soil health, maximize biological carbon sequestration and accelerate climate mitigation and resilience measures. Our geographic focus is Ventura County and the surrounding region.

We commend and support the letter developed by a broad coalition including Californians for Pesticide Reform (CPR) and submitted to your committees on March 21 which addresses the testimony in your March 8 joint hearing on pesticides. The CPR coalition comment describes the

failures of the Department of Pesticide Regulation to fulfill its obligation to prevent harm to public and environmental health. The testimony of Dr. Kim Harley detailing data revealed in the CHAMACOS study is compelling regarding the pesticides present in the bodies of farmworkers and those around where pesticides are used. We stand with the CPR coalition in asking that the Department of Pesticide Regulation stop all unnecessary use of toxic pesticides. Highlighted in the CPR coalition letter is the recent release of a report by the Environmental Working Group, which used Ventura County as a case study to see just how much exposure communities on the edge of major ag operations are experiencing.¹ Using data from DPR, they demonstrate that 70% of Ventura County residents live within 2.5 miles of agricultural pesticide use, the distance linked in recent studies² to childhood brain tumors and other cancers.

What your hearing and the CPR coalition letter do not cover is the direct connection between the anthropogenic causes of the climate crisis and the failure to protect people and the environment from toxic pesticides. Pollution from every source must be quickly and significantly reduced to protect the integrity and health of the biosphere and a livable planet. We specifically direct your attention to the damage from toxic chemicals to formerly productive soils and how the resulting impairment contributes to ecosystem collapse and climate disruption.

Ecological harm from pesticide use is not limited to where biocides are applied but rather cascades and expands into protected and conserved lands. Fortunately, solutions exist to cultivate lands without toxic inputs. Biologically-based agricultural systems can reduce the negative externalities of toxic inputs and allow for the agricultural system itself to build fertility, support significant amounts of biodiversity, retain water, and sequester carbon dioxide and prevent the release of nitrous oxide.

A new study “Pesticides and Soil Invertebrates: A Hazard Assessment”, Gunstone, T., et. al., 2021, found that in 71% of cases studied, pesticides across all classes studied, kill or harm soil invertebrates including earthworms, ants, beetles and ground nesting bees. The review shows “extensive evidence that pesticides pose a serious threat to soil invertebrates and the essential ecosystem services that they provide” and supports “inclusion of a soil health analysis in the US pesticide risk assessment process.” This common sense principle is validated by an abundance of science.

¹ <https://www.ewg.org/research/report-32-million-pounds-toxic-pesticides-sprayed-ventura-county-fields-2-015-2020-10>.

² Park, A., et al., International Journal of Hygiene and Environmental Health, Volume 226, May 2020, 113486, <https://doi.org/10.1016/j.ijheh.2020.113486> Lombardi, C., et al., Environmental Research, Volume 197, June 2021, 111078, <https://doi.org/10.1016/j.envres.2021.111078>

Therefore, in addition to the important CPR coalition recommendations, we additionally propose that you evaluate ecosystem and climate impacts from pesticide use in addition to environmental justice considerations.

We specifically recommend:

1. measurable goals for natural carbon sequestration in at least one of the scoping plan scenarios currently being developed by the Air Resources Board staff,
2. a goal of 30% organic acreage in the state by 2030, not 2045, included as an across-the-board assumption in all scoping plan scenarios – based on the data showing that the level of organic adoption correlates with greenhouse gas emission reductions from farmland along with a range of additional co-benefits for public health and ecological and economic sustainability, and
3. more effective investments, particularly that cap and trade revenues not be granted by the Healthy Soils Program to farmers that use toxic pesticides.

Much more data and rationale can be submitted. Another hearing focused on the ecological and climate impacts resulting from pesticides is needed. Thank you for the opportunity to comment and provide input on the March 8 hearing covering this crucially important topic.

Sincerely,

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350 Ventura County Climate Hub

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350 Southland Legislative Alliance

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CC Assembly Members Jacqui Irwin and Steve Bennett and Senators Monique Limon and Henry Stern