



May 1, 2016

Pam Wofford  
California Department of Pesticide Regulation  
1001 I Street, PO Box 4015  
Sacramento, CA 95812-4015

RE: Proposed changes to Air Monitoring Network

*Sent via e-mail*

Dear Ms. Wofford,

On behalf of the Californians for Pesticide Reform coalition and the 44 co-signatories listed below, I want to thank you for the opportunity to provide comments on the proposed changes to DPR's Air Monitoring Network (AMN). We are encouraged that you are considering changes to the AMN that would better address the concerns of affected communities, and would like to reiterate the coalition's priorities as stated in our many meetings and previous comment letters to DPR, CalEPA and ARB.

Modifying Objectives: Our primary objective in seeking modifications to the AMN is to make sure that scarce monitoring resources are used most effectively to capture true community exposure. Better data are needed both in order to protect those facing the highest potential exposure, and to create effective modeling tools that can be applied elsewhere, thereby expanding the utility of the AMN. **We believe that DPR's objectives should be modified to include the goal of evaluating the highest level of potential exposure**, which is not currently addressed either explicitly or implicitly in the existing stated objectives.

Change of Locations: There is a sufficient body of data collected by the Air Monitoring Network from 2011-2014 to identify weaknesses in the existing network, and to justify relocating monitoring sites that are not providing useful data. The current locations do not adequately represent factors that are known to result in a greater likelihood of exposure to pesticides in the air – notably proximity to fields and weather conditions favorable to pesticide drift. For example, in communities across the state, you can find homes and schools in areas more likely to have pesticide exposure because they are closer to and downwind from fields. As a result, the data collected from the existing monitoring network is of limited usefulness.

Monitoring should be conducted in communities most at risk of pesticide drift and airborne pesticide exposures. Communities located in areas with significant use of the two highest priority classes of pesticides - organophosphates and fumigants - should be prioritized. Because crop and use patterns for these two different classes of pesticides are different, ranking of communities should consider the top uses for each class separately, rather than a combined score. Further prioritization based on meteorological conditions favorable for

1611 Telegraph, Suite 1200, Oakland, CA 94612  
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drift (wind direction and typical frequency of calm days) can be used, as long as critical agricultural areas are still represented.

Within communities, selection of monitoring sites should consider the following:

- An evaluation of pesticide use close to and upwind of candidate monitoring sites. Monitors should be placed near locations of the highest use of pesticides of high toxicity and volatility within a community.
- An evaluation of weather conditions close to candidate monitoring sites. Monitors should be placed where they will capture maximum potential drift based on evaluation of meteorological analysis.
- A preference for schools. Three of the six DPR and ARB monitoring sites are currently located on or adjacent to school sites (Rio Mesa in Oxnard, Ohlone near Watsonville and Shafter in Kern). It is important to maintain monitoring sites at or near schools, but the selected schools should be closer to and downwind of fields than the current location at Shafter High School.

Specific changes to the locations should be made as follows:

**DPR Sites:** The DPR sites should be moved to sites that better capture peak exposure.

- **Salinas airport:** Relocating this monitoring site is the coalition's highest priority. The current site at Salinas Airport is downwind (south-east) of Salinas's urban core, with very few pesticide applications of monitored pesticides within the one square mile section where the monitor is located. Because of the high degree of community interest in air monitoring data in Salinas, we urge DPR to maintain an air monitoring site in Salinas, but to select a new location that is downwind of the highest density of fumigant use. Previous monitoring by ARB in north Salinas found high fumigant levels. A more suitable site is Gavilan Middle School, which is surrounded on three sides by strawberry fields. The new site should include seasonal chloropicrin monitoring to fully evaluate sub-chronic exposure.

- **Shafter (Kern County):** The air monitoring site at Shafter High School in Kern County should be moved to one of the smaller communities flagged in DPR's reanalysis if a suitable monitoring site can be located. If not, then the site should be relocated from Shafter High to nearby Sequoia Elementary, northwest of the Shafter site and closer to fields.

**Ripon:** We support DPR's plan to stop monitoring at this site.

**ARB Sites:** We urge DPR to ask ARB to continue seasonal chloropicrin monitoring at all of its monitoring sites, and to consider monitoring for MITC at sites near high use.

- **Santa Maria:** ARB or DPR should add monitoring for non-fumigant pesticides, because of high use of organophosphates and fungicides nearby.

- **Rio Mesa (Oxnard):** ARB or DPR should continue monitoring here or relocate to another suitable site in Ventura County.

- **Ohlone Elementary (Watsonville):** Because of the high degree of community

engagement at Ohlone Elementary and proximity to fields upwind, we advocate maintaining this air monitoring site.

Adding Pesticides: We support the addition of the proposed pesticides of public health concern: 2,4-D, Captan, Fenpyroximate (Fujimite), Imazalil (Magnate), Methomyl (Lannate), Pendimethalin (Prowl).

Sampling Frequency: Given limited monitoring resources, DPR should focus on more targeted seasonal monitoring. During the high-use season, multiple samples per week would allow for better characterization of peak exposures, reduce the impact of failed or lost samples, increase the overall capacity to correlate air concentrations with use data and meteorological conditions, and better evaluate cumulative exposures.

Monitoring Schedule: DPR and ARB should consider monitoring additional communities in alternating years to capture data in a wider range of locations. There is a range of variables that impact air concentration, including meteorological conditions, topography, application methods, and pesticide chemistry. By expanding the number of locations, Air Monitoring Network data will reflect a wider range of these variables, improving the degree to which the dataset represents exposures in California communities.

DPR should also consider adopting a randomized schedule, to prevent growers from adapting use to predicted monitoring.

Thank you again for the opportunity to provide input on the AMN. Communities throughout California live, learn and play in close proximity to fields, making it essential that DPR conduct a rigorous evaluation of pesticide exposures in the air in order to better protect them from health harms. To achieve this, the AMN must be improved to better capture real-world exposures.

Sincerely,



Sarah Aird, Co-Director, Californians for Pesticide Reform

**Co-Signatories:**

California Association of Bilingual Educators, Pajaro Valley Chapter 66, Lucia Villarreal, Chapter President

California Institute for Rural Studies, Gail Wadsworth, Executive Director

California Rural Legal Assistance Foundation, Anne Katten, Pesticide and Work Safety Specialist

California Walks, Wendy Alfsen, Executive Director

Carmel Valley Women's Network, Darby Moss Worth and Ruth Gingerich, CPNP, MSN, Co-Chairs

Center for Biological Diversity, Jonathan Evans, Environmental Health Legal Director and Senior Attorney  
Center for Environmental Health, Caroline Cox, Research Director  
Center for Farmworker Families, Dr. Ann Lopez, Executive Director  
Center on Race, Poverty and the Environment, Caroline Farrell, Executive Director  
Central California Asthma Collaborative, Kevin D. Hamilton RRT, RCP, Executive Director  
Clean Water and Air Matter (CWAM), Renee Donato Nelson, President  
Communities for Sustainable Monterey County, Member of the Safe Ag, Safe Schools coalition, Luana Conley, Director  
Community Science Institute, Denny Larson, Executive Director  
Dolores Huerta Foundation, Lori de León, Legislative Associate  
El Quinto Sol de America, Isabel Arrollo, Executive Director  
Environmental Working Group, Bill Allayaud, California Director of Government Affairs  
EPIC - Environmental Protection Information Center, Natalynne DeLap, Executive Director  
Farmworker Association of Florida, Jeannie Economos, Pesticide Safety and Environmental Health Project Coordinator  
Farmworker Justice, Virginia Ruiz, Director of Occupational and Environmental Health  
Fisherman's Choice LLC, Katrina Wetle, Owner  
Food Empowerment Project, Lauren Ornelas, Founder/Executive Director  
Friends of the Earth, Lisa Archer, Director, Food and Technology Program  
Justin Matlow, Educator, Safe Ag, Safe Schools, drift catcher monitor  
Klamath Forest Alliance, Kimberly Baker, Executive Director  
Label GMOs, Pamm Larry, Director  
Live Oak Friends Meeting, Terrill Keeler and Kitty Mizuno, Co-Clerks  
Monterey Bay Central Labor Council, Robert Chacanaca, President  
Northwest Center for Alternatives to Pesticides, Kim Leval, Executive Director  
Occidental Arts and Ecology Center, Dave Henson, Executive Director  
Pajaro Valley Federation of Teachers AFT 1936, Francisco Rodriguez, President  
Parents for a Safer Environment, Susan JunFish, MPH, Executive Director  
Pesticide Action Network North America, Paul Towers, Organizing and Media Director  
Pesticide Free Marin by 2016, Barbara Bogard, Co-chair  
Pesticide Free Zone, Ginger Souders-Mason, Director  
Physicians for Social Responsibility - San Francisco, Robert M. Gould, M.D., President  
Physicians for Social Responsibility - Los Angeles, Martha Dina-Arguello, Executive Director  
Promotores Comunitarios del Desierto, Eduardo Guevara, Executive Director  
Safe Ag, Safe Schools, Carole Erickson, Co-Chair  
Sprout Up - Santa Cruz Chapter, Rebekkah Scharf, Chapter Director  
Stop West Nile Spraying Now, Samantha McCarthy, Coordinator  
Sustainable Seaside, Kay Cline, Chairperson  
Swanton Berry Farm, Jim Cochran, President  
Turning Green, Judi Shils, Executive Director  
Wine and Water Watch, Shepherd Bliss, Steering Committee Member

Cc: Brian Leahy, Director, California Department of Pesticide Regulation  
Matthew Rodriguez, Secretary, California Environmental Protection Agency