



Californians for Pesticide Reform
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December 17, 2004

Randy Segawa
Department of Pesticide Regulation
1001 I Street
P.O. Box 4015
Sacramento, CA 95812-4015

Re: Environmental Justice Pilot Project – Pesticide Air Monitoring in a Rural Community

Dear Mr. Segawa:

Please find below Californians for Pesticide Reform's (CPR) comments on initial criteria for the Department of Pesticide Regulation's (DPR) Environmental Justice Air Monitoring Pilot Project. CPR has developed these comments in collaboration with many member groups across the state, particularly participants in our Safe Air for Everyone (SAFE) Campaign in the southern San Joaquin Valley.

1: What should be the specific objectives of the air monitoring study?

As an environmental justice project, this project should focus on investigating the health implications of pesticide exposure in low income communities and communities of color. Specifically, the project should compare measured pesticide levels to levels of concern for human health in low income communities and communities of color. DPR should also use this opportunity to reevaluate established Reference Exposure Levels for pesticides tested and ensure that they are strongly health protective, particularly if testing documents consistent presence of pesticides in the air over the longer term (even if the concentrations are at lower levels) and/or high concentrations of pesticides in the air.

2: How should DPR select the community to monitor?

We strongly urge DPR to conduct air monitoring not only in the Central Valley but also in communities located in other areas of high pesticide use across the state, such as in Ventura, the Central Coast, Napa Valley and Imperial Valley.

If it is impossible to conduct testing outside of the Central Valley in this pilot project, we suggest that DPR conduct air monitoring in more than one community. Ideally, several tests could be conducted to get a regional sample throughout the Central Valley, including Fresno, Kern, Tulare, Kings, Merced, Madera, Stanislaus, and San Joaquin counties.

2.

Some criteria to consider when picking communities/testing locations are:

- Populated areas where communities of color and low income communities live
- Areas with lower literacy rates
- Areas with poor air quality
- Areas with the highest asthma rates
- Towns with mega dairies nearby
- Areas with high infant mortality

In the communities themselves, testing near schools and homes should be prioritized.

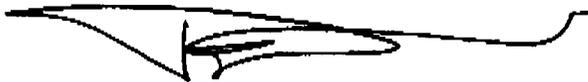
3: How should DPR select the pesticides to monitor?

DPR should focus the project on high-use pesticides that are the most drift-prone (volatile) and the most hazardous (known or probable carcinogens, reproductive or developmental toxicants, neurotoxic cholinesterase inhibitors or pesticides with high acute toxicity). Specific chemicals that might be appropriate include metam sodium, chloropicrin, chlorpyrifos, and telone.

To ensure that the samples reflect real conditions, DPR should ensure that air monitoring occurs without the prior knowledge of growers and pesticide applicators. Samples should also be collected both during applications and over at least several weeks afterwards.

Thank you for the opportunity to comment on the Air Monitoring Pilot Project. We look forward to further collaboration on this project.

Sincerely,



Tracey Brieger
Campaign Coordinator