

Center on Race, Poverty and the Environment

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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 :

The Center on Race, Poverty & the Environment (CRPE) submits these comments on the Department of Pesticide Regulation's (DPR) Environmental Justice Pilot Project which will monitor pesticides in the rural community's air. CRPE has divided its comments into the three issue areas on which DPR solicited comments.

1. What should be the specific objectives of the monitoring study?

Since this is an environmental justice project, one of the main objectives of the study should be to determine the extent of low income communities and communities of color exposure to air borne pesticides. The other objectives should be to determine which pesticides contribute the greatest to exposure and whether the pesticides exceed levels of concern to human health. But, in addition to that the study should also determine whether or not those levels of concern are appropriate or if they need to be revised in light of the data collected.

1. How should DPR select the community to monitor?

Ideally DPR would study more than one community. Different crops are grown in different regions of the Valley and therefore different pesticides are used. DPR should consider choosing one community from the three main regions of the Valley- North, Central, and Southern. DPR should pick a community of color or low income community which is

representative of the region in terms of pesticide use, proximity of fields to residential areas, demographics, number of children and wind speed.

3. How should DPR select the pesticides to monitor?

Since it is important to understand overall exposure, DPR should select pesticides that can be analyzed in the same sample as other pesticides. However, it is also important DPR study exposure to the most frequently used pesticides as well as the most toxic pesticides. Pesticides that fit all three of the above categories should be given priority.

To ensure representative samples, DPR should also ensure as part of its monitoring programs that sample collection is not prearranged with growers. Samples should be taken randomly and include times shortly after pesticides have been sprayed to ensure the monitoring does not reveal deceptively low monitoring measurements.

Thank you for the opportunity to comment. CRPE looks forward to further participation in the EJ Pilot Project.

Sincerely,

Caroline Farrell
Attorney at Law