Air Monitoring Network Expansion – Response to Comments

November 2026

Air Program
Environmental Monitoring Branch
California Department of Pesticide Regulation
1001 I Street (P.O. Box 4015), Sacramento, CA 95614

COMMENT #1	RESPONSE AND ACTION
From: California for Pesticide Reform (CPR) The Regional Zone and the Greater Regional Zone are too limiting to capture the "big picture" of pesticide use. DPR should include the pesticide use density within geographic areas larger than the 5-mile (for organophosphates) and 10-mile radius (for fumigants).	The AMN Expansion analysis is based on 2020–2024 PUR data. DPR's Air Program conducts fumigant modeling using a 10-mile boundary and nonfumigant analysis using a 5-mile boundary. These boundaries are consistent with patterns observed in both DPR's modeling and monitoring data. DPR has found that this approach effectively captures the overall distribution of pesticide use within the geographic area.
COMMENT #2	RESPONSE AND ACTION
From: Anonymous, California for Pesticide Reform (CPR), Pesticide Action & Agroecology Network (PAN) **Note**: DPR received multiple similar comments suggesting the inclusion of population density in the analysis. For simplicity, DPR has chosen to include only one representative comment. DPR should consider human population density. In other words, in each community being considered, DPR should include an estimate of how many people are potentially exposed to airborne pesticides.	Population density was initially evaluated as a potential criterion but was ultimately excluded because it disproportionately shifted the use density toward communities with larger populations rather than those with higher pesticide use.
COMMENT #3	RESPONSE AND ACTION
From: Anonymous, Pesticide Action & Agroecology Network (PAN) This is a pretty sophisticated analysis, but it focuses on a level of fine detail that appears to overlook big picture concerns. One example is that counties or areas with high exposure risks may have been dropped or excluded (e.g. Salinas Valley for OP clusters, Kings County for high and fumigant use plus high pollution burden). By using the 1 mile from schools and 10 mile radius of clusters, a variable number of potential sites were generated in the counties eventually chosen as priority. The DPR white paper reported that high priority communities identified in Santa Cruz and San Luis Obispo were within 10 miles of existing AMN	Pesticide use for each community in California was evaluated based on four zones: within the community (community zone), 0–1 mile (local zone), 1–5 miles (regional zone), and 5–10 miles (greater regional zone). DPR calculated pesticide use density (lbs./sq. mi.) by dividing total use within each zone by its area. DPR developed an initial list of potential air monitoring locations based on the pesticide use density. This list was subsequently reduced due to funding limitations, which allow for only four new monitoring stations. Additional sites in Monterey County, including sites in the Salinas Valley, were removed from consideration because an existing monitoring station is already located at Pajaro Middle School. Two communities in Kings County were initially

stations in Monterey and Santa Barbara Counties, however, DPR proposed not to consider new AMN stations at the priority locations because the information should be "independent" and to increase "geographic coverage." While it is desirable to have more monitoring in more locations, this choice does not consider the additional factor that is specific to California. From a scientific perspective in terms of collecting unique data on organophosphate pesticides and fumigants, an additional monitoring site within 5-10 miles of an existing air monitor would still yield valuable data, as there are data indicating that when distance data are available, the majority of pesticide drift incidents occur within one mile. In addition, DPR should use closer proximity data for intensity of pesticide use for fumigant pesticides to further target the site selection.	identified as potential monitoring sites; however, one was removed due to the absence of schools within a 1-mile radius, and the other did not have any of the top 50 ranked communities within 10 miles. Even after this initial screening, the number of eligible communities exceeded the available capacity for four new stations. High-priority communities identified in Santa Cruz and San Luis Obispo counties were found to be within 10 miles of existing AMN stations in Monterey and Santa Barbara counties. Under the site selection SOP, pesticide applications occurring within 5–10 miles are expected to influence air monitoring results. Consequently, air concentrations measured at prospective sites in these areas would likely reflect many of the same sources as the existing stations. To maintain the independence of monitoring data and to expand the geographic coverage of the network, DPR removed the sites in Santa Cruz and San Luis Obispo Counties from consideration for permanent stations. However, DPR may consider monitoring at those sites through the placement of the mobile monitor or other types of studies.
COMMENT #4	RESPONSE AND ACTION
From: Anonymous, California for Pesticide Reform (CPR), Pesticide Action & Agroecology Network (PAN) **Note**: DPR received multiple similar comments about the emission fraction derived from fumigant application methods. For simplicity, DPR has chosen to include only one representative comment. DPR should not rely on reported fumigant application methods to assess which communities are likely to experience high air concentrations when prioritizing monitoring sites. In other words, DPR should not reduce the priority of a particular site based on the use of reported "low-emission" application methods. First, application methods can change year to year. A community currently surrounded by lower-emission fumigant applications this year, may be exposed to higher-emission methods in the future.	Our analysis shows that application methods within a given region (for example, coastal or inland areas) relate closely to the cropping systems dominant in the area, which are relatively constant from year to year. Hence, when prioritizing sites, it can be reasonably assumed that usage patterns over a preceding 5-year period can provide some prediction of future usage patterns in the area. Application methods have an important effect on the amount of fumigant emitted into the air, and application method selection is among the factors with the greatest potential to reduce fumigant emissions. While it is true that emissions will vary depending on soil and environmental conditions, and that no individual field study can capture the extent of variation that might occur under real-world conditions, DPR supplements its field studies with modeling studies to evaluate the effectiveness of different application methods under a broad range of conditions. This modeling allows DPR to both compare application methods to one another under a standard set of conditions

Second, there is insufficient evidence at this time to conclude that any particular fumigant application method consistently results in low-emissions. While DPR has conducted field studies measuring emissions under various application methods, these studies are limited in number relative to the wide range of soil types, weather conditions, and operational practices across California. Moreover, DPR's field studies were conducted under certain situations, including proper soil preparation, correct injection depth, and intact tarps maintained throughout the fumigation. In contrast, field conditions often deviate from these standards. Injection depth might be too shallow, tarps may blow off or are removed prematurely, etc. For example, a Monterey County Agricultural Commissioner staff member once indicated that, in his experience, tarps may blow off prematurely in about half of all field fumigations!	to better capture potential emission reductions, and to estimate the average emissions from the method under California conditions. This is critical for placement of long-term monitoring sites, because while some fields may emit more or less than the average, in the long-term the emissions from fields are expected to be near the average value. County Agricultural Commissioner staff work with certified applicators and growers to ensure that applications meet all requirements. As a result, DPR supports using fumigant emission factors (EF) in selecting monitoring sites.
COMMENT #5	RESPONSE AND ACTION
From: Anonymous, California for Pesticide Reform (CPR), Pesticide Action & Agroecology Network (PAN) **Note**: DPR received multiple similar comments suggesting the inclusion of OEHHA's CalEnviroScreen Pollution Burden into the analysis. For simplicity, DPR has chosen to include only one representative comment. It is concerning that the procedure for prioritizing communities omits key CalEnviroScreen 4.0 data on pollution burden. DPR should incorporate CalEnviroScreen's indicators for airborne toxics beyond pesticides, such as PM2.5, diesel particulate matter, and toxic releases from facilities. For example, air quality, ozone, and pesticide use are all related indicators in pollution burden and potential harm. Pesticide concentrations may have more impact in communities already burdened by non-pesticide toxics and by cumulative exposures.	The AMN is designed to measure pesticide concentrations in the ambient air. The AMN provides data that supports assessing potential pesticide health risks, developing measures to mitigate risks, and evaluating the effectiveness of current pesticide regulatory requirements. OEHHA's CalEnviroScreen (CES) 4.0 evaluates census tracts using two composite scores: a pollution burden score and a population characteristics score. The pollution burden score is based on exposure and environmental effect indicators, while the population characteristics score is based on sensitive population and socio-economic factors indicators. One of the indicators of pollution burden is pesticide use, which is populated by DPR's Pesticide Use Reporting (PUR) data. The remaining individual indicators do not fall under the umbrella of DPR. As a result, DPR utilized PUR data to rank communities based on highest use of targeted pesticides. The 50 communities with the highest use were then re-ranked using the Population Characteristics indicators from CES 4.0. This approach provides a better assessment of communities to prioritize for monitoring pesticides in the ambient air.
COMMENT #6	RESPONSE AND ACTION

From: California for Pesticide Reform (CPR) When choosing which areas are considered organophosphate (OP) communities, only 11 organophosphates are considered. We recommend that: a. Methidathion and oxydemeton-methyl are no longer considered since they are no longer registered. b. Ethoprop—which is heavily used on sweet potato fields in Stanislaus and Merced Counties—be considered. PFAS. DPR should add PFAS pesticides to the list of pesticides monitored in AMN samples–particularly those with moderate or higher vapor pressure. That should include both active ingredients that themselves are PFAS, and pesticide products that contain inactive ingredients that are PFAS.	The 11 organophosphates that are considered in this analysis are the 11 that are monitored for in the AMN. Although methidathion and oxydemeton methyl are no longer registered for use, they remain part of the AMN analytical screening. Accordingly, DPR is not considering the removal of these compounds. This proposal is focused on current efforts to expand the physical Air Monitoring Network, rather than what pesticides are analyzed. DPR appreciates the feedback for any future efforts to expand the pesticides monitored in the AMN.
COMMENT #7	RESPONSE AND ACTION
From: Anonymous, California for Pesticide Reform (CPR), Tulare County Coalition Advocating for Pesticide Safety (CAPS) **Note:** DPR received multiple similar comments suggesting non-school locations as potential monitoring sites. For simplicity, DPR has chosen to include only one representative comment. It is probably best for AMN sites to include a mix of schools and non-school sites, such as residential areas located within regions of high pesticide use. Recent restrictions on fumigant use near schools (3 CCR 6691) that include buffer zones may have reduced exposure at schools. In contrast, those restrictions do not extend to residential areas, so children's highest exposure might occur in residential areas near agricultural fields.	To maintain consistency with established practices, DPR's analysis prioritizes placement of new AMN monitoring stations at schools or near school grounds. However, DPR will consider non-school sites suggested by the public that meet the US EPA siting criteria for placement of a monitor.
COMMENT #8	RESPONSE AND ACTION
From: Anonymous, California for Pesticide Reform (CPR), Pesticide Action & Agroecology Network (PAN)	DPR conducted a comprehensive analysis of 2020–2024 PUR data for all California communities using the 2020 U.S. Census. This analysis identified the communities with the highest pesticide use and, from that list, DPR determined the counties with

Note: DPR received multiple similar comments about evaluating county and school pesticide use. For simplicity, DPR has chosen to include only one representative comment. It does not appear you also checked your numbers by county, or, as we have been doing lately, by school district, which might reveal different patterns of overall exposure in a county or area. For example, the Pajaro Valley USD, between 2017 and 2022, had over 9.6 million pounds of fumigants and organophosphates applied within the boundaries of the fractions of two counties in which it is located. The remaining 5 counties on the priority list all contain areas of high fumigant and/or OP use. However, when fumigant and organophosphate use are counted for each county, ranking order differs from DPR's (see Table 1). The top 6 counties all have, or will soon have, monitors. Ideally, all 12 counties would have one or more monitors in areas of high exposure risk, determined by proximity, population vulnerabilities, and pollution burden. Fumigant and OP poundage, combined, 2017-22 Numbers are in millions, and rounded: Kern (32.5 million), Fresno (27.5 million), Monterey (19.5 million), Santa Barbara (17 million), Ventura (16.2 million), Merced (15 million), Stanislaus (12 million), San Joaquin (8.8 million), Siskiyou (6.7 million), San Luis Obispo (6.7 million), Kings (6.1 million), Tulare (5.7 million).	the highest overall use. While our approach was different than the approach suggested by this group of commenters, we reached the same conclusions. The results referenced by the commenters are based on older PUR data. The six counties mentioned in the comments—Kern, Fresno, Monterey, Santa Barbara, Ventura, and Merced—either already have an AMN monitoring station or will have one established. As previously stated by DPR, counties with existing monitoring stations were excluded from further consideration to expand monitoring in agricultural and pesticide use regions across the state. The remaining six counties with high pesticide use—Stanislaus, San Joaquin, Siskiyou, San Luis Obispo, Kings, and Tulare—were identified as potential locations for new stations. San Luis Obispo and Kings Counties were later removed based on DPR's selection criteria. With the final list, DPR will be monitoring in ten of the twelve counties with high pesticide use. DPR current capacity is ten monitoring stations in total and one mobile monitoring station.
COMMENT #9	RESPONSE AND ACTION
From: Anonymous, California for Pesticide Reform (CPR), Pesticide Action & Agroecology Network (PAN) **Note**: DPR received multiple similar comments about the inclusion of wind direction into the analysis. For simplicity, DPR has chosen to include only one representative comment. The use density in each zone was adjusted based on the average wind speed. We offer the following concerns and recommendations: Adjusted use density should also factor in temporal wind speed and direction. These factors are key to plans for mitigation and, more importantly, for prevention.	As described in DPR's Air Monitoring Network Site Selection Standard Operating Procedure, DPR utilizes meteorological data from the California Irrigation Management Information System (CIMIS), a statewide network of approximately 145 automated weather stations. CIMIS data were used for standardizing wind speed across communities. However, we acknowledge that wind direction is important in decision-making for site selection as mentioned by the commenters. Therefore, wind-roses, which provides a general overview of wind speeds and directions, for the nearest meteorological station will be provided for each potential community that is proposed to be included in the AMN for the four counties that were selected for monitoring.

COMMENT #10	RESPONSE AND ACTION
From: California for Pesticide Reform (CPR) We request that DPR test whether their assumption that the 5-year average wind speed meaningfully correlates with actual ambient pesticide concentrations across different conditions, as it is currently used to prioritize communities for pesticide air monitoring. A single averaged value (eg, 6 mph) obscures significant day-to-day and seasonal variability, including calm periods when pesticide concentrations can be at the highest—even in generally windy regions. Perhaps the mobile unit could test whether a single parameter, average wind speed, is correlated with ambient air concentrations in a particular region.	DPR appreciates this recommendation and will take it under review as we continue refining the methodology.
COMMENT #11	RESPONSE AND ACTION
From: Pesticide Action & Agroecology Network (PAN) In the section on meteorological data of the SOP (2.3), DPR's assumptions that higher average wind speed dilutes pesticide concentrations and potentially reduces exposure are flawed. Higher than average wind speeds in proximity to intensive pesticide use are not likely to reduce exposure to pesticides in the air. In fact, it is common best practice to avoid windy conditions and apply pesticides during calm periods, as winds are known to increase the likelihood of off-target pesticide drift. DPR should use data that indicate higher than average wind speeds in a community as a factor that potentially increases exposure to pesticide drift, to prioritize areas with higher than average wind speeds for monitoring. DPR did not consider temperature data in this section, and should consider temperature as an additional consideration because temperature is known to affect volatilization. DPR should provide these data on wind direction in all future discussions of AMN site selection.	There are different types of off-site pesticide transport. For cases where a pesticide is being emitted as a gas, such as the emissions of a fumigant from soil, or during volatilization of pesticide from a deposited droplet, an increase in wind speed dilutes the mass of emitted pesticide with a greater volume of air, while also increasing plume spread. This will decrease breathing zone concentrations. In terms of spray deposition (meaning spray droplets landing on a surface), it is correct that higher wind speeds will carry droplets further; for this reason, applications are typically restricted at wind speeds of 10-15 mph or greater. However, the air sampling methods used by the AMN were developed for the sampling of pesticides in the air rather than droplet drift. DPR will evaluate whether it is appropriate to include temperature and wind direction during development of future iterations of the AMN site selection SOP.

COMMENT #12	RESPONSE AND ACTION
From: African American Farmers of California, Anonymous, California Agricultural Aircraft Association, California Apple Commission, California Blueberry Commission, California Citrus Mutual, California Cotton Ginners and Growers Association, California Fresh Fruit Association, California Strawberry Commission, California Tomato Growers Association, California Wild Rice Advisory Board, Grower-Shipper Association of Central California, Nisei Farmers League, Olive Growers Council of California, TriCal Group of Companies (TSS), Western Plant Health (WPH), Western Tree Nut Association **Note**: DPR received multiple similar comments asking for additional information about the mobile monitoring station. For simplicity, DPR has chosen to include only one representative comment. WPH appreciates DPRs creative plan to utilize a mobile monitoring station to provide additional monitoring for communities under the current funding mechanisms in place. However, we are concerned about the lack of clarity regarding where, when, and for what duration the mobile station would be utilized. The 2026 Site Selection SOP describes in detail how DPR selects communities for permanent AMN stations: pesticide use data reports, buffer zone methodology, emission adjustments, meteorological data, and environmental justice concerns. The SOP contains no comparable framework for the mobile monitoring station. DPR's description of the mobile platform runs to only a few paragraphs and leaves unanswered fundamental questions about its use and deployment.	DPR is releasing a strategy document concurrently to the release of this response to comments that will outline site consideration criteria, capabilities, and siting criteria This strategy will clarify the circumstances under which the mobile station will be used, the types of studies it will support, and how results will be incorporated. The mobile station will be sited according to US EPA ambient air monitoring criteria and will be used only to assess pesticide concentrations in ambient air, not for edge-of-field or application studies. DPR will follow approved protocols for all monitoring activities, issue a protocol for each mobile station deployment, and analyze data according to each study's specific objectives.
COMMENT #13	RESPONSE AND ACTION
From: Western Plant Health (WPH) WPH recommends that the mobile AMN station be used to monitor locations in counties not currently included in the ten counties identified in the 2026 AMN expansion program. This would allow residents of counties not selected for permanent monitoring stations to be assured that DPR is not	Please see response to comment #12. DPR's strategy document for deployment of the mobile monitoring platform includes provisions for counties with and without permanent AMN sites to meet various policy or program needs.

ignoring those communities outside the current list of counties. It would also allow DPR to re-evaluate or reprioritize counties that are demonstrating a need for permanent monitoring locations.	
COMMENT #14	RESPONSE AND ACTION
From: Western Plant Health (WPH) WPH is concerned about the very vague parameters surrounding the mobile station's use. DPR describes its use to be "quickly deployed to locations throughout California requiring evaluation for periods of one year or less." WPH is opposed to the use of the mobile station for short periods of monitoring. We believe that best use of the mobile monitoring station is to assure that the appropriate counties are being monitored, or to determine what county should be added to the AMN in the future. We believe that any monitoring by the mobile station must follow the same monitoring protocols including a minimum one-year set of data to be evaluated. The potential use of "snapshot collected data" could again result in skewed results that would impact results for not only that location, but the overall AMN data collected and annual reports.	Please see response to comment #12. DPR acknowledges the concern regarding short-term monitoring. DPR has conducted short-term monitoring, such as seasonal studies, when needed to support the goals of DPR. When short duration monitoring is conducted, DPR will ensure that the results and their interpretation are properly contextualized to avoid inappropriate comparison with long-term AMN data, similar to previous seasonal study reports.
COMMENT #15	RESPONSE AND ACTION
From: California for Pesticide Reform (CPR) DPR should use data collected from its new mobile air monitoring station to validate the predictions generated by its models. For example, how accurately do these models estimate fumigant concentrations in relation to nearby sites in Notices of Intent, and how well do they account for differences between high-emission and low-emission application methods?	Please see responses to comments #5 and #12. DPR uses all monitoring data it collects to assess and validate model predictions. As additional data from the mobile station becomes available, DPR will continue to use these measurements to refine model inputs, evaluate underlying assumptions, and improve the accuracy and applicability of its modeling tools.
COMMENT #16	RESPONSE AND ACTION
From: California for Pesticide Reform (CPR) The mobile monitoring station should also be used to conduct some more comprehensive monitoring (e.g., 4 days per week) at monitoring sites during time periods when high air concentrations of certain	The purpose of the AMN is to provide DPR with data on pesticides in ambient air that supports the long-term assessment of potential pesticide exposure. The goal is to generate consistent, long-term monitoring data across all AMN stations through weekly sampling.

pesticides (such as 1,3-D) have been recorded in the past.	The mobile monitoring station will have the capabilities of a standard AMN station while offering flexibility to be deployed to selected study locations for short-term deployments. Once the mobile monitoring station is deployed, it will stay in its location for the duration of the study. The station will collect weekly 24-hour samples following established AMN protocols. It will be equipped with standard sampling instrumentation used in the AMN, including a weather tower.
COMMENT #17	RESPONSE AND ACTION
From: African American Farmers of California, California Agricultural Aircraft Association, California Apple Commission, California Blueberry Commission, California Citrus Mutual, California Cotton Ginners and Growers Association, California Fresh Fruit Association, California Strawberry Commission, California Tomato Growers Association, California Wild Rice Advisory Board, Grower-Shipper Association of Central California, Nisei Farmers League, Olive Growers Council of California, Western Tree Nut Association The Framework describes the MiTAP instrument as providing "semi-real-time" continuous hourly fumigant monitoring. What validation studies support the comparability of MiTAP hourly data with the 24-hour integrated samples collected by the standard AMN method? How will DPR account for any systematic differences between these two measurement approaches?	DPR is currently evaluating MiTAP instrumentation for semi-real-time monitoring of soil fumigants in the field. DPR will publish a report summarizing the results of this evaluation. Data collected by the MiTAP instrument will be compared with measurements obtained using standard AMN instruments. Any differences between these measurement approaches, as well as their implications, will be addressed in the forthcoming report.
COMMENT #18	RESPONSE AND ACTION
From: African American Farmers of California, California Agricultural Aircraft Association, California Apple Commission, California Blueberry Commission, California Citrus Mutual, California Cotton Ginners and Growers Association, California Fresh Fruit Association, California Strawberry Commission, California Tomato Growers Association, California Wild Rice Advisory Board, Grower-Shipper Association of Central California, Nisei Farmers League, Olive Growers Council of California, Western Tree Nut Association	The mobile monitoring station will be equipped with the standard sampling instruments used in the AMN, along with a weather tower after evaluation. All equipment is routinely calibrated in accordance with the manufacturer's instructions or directly by the manufacturer. The mobile monitoring station adheres to established AMN quality assurance and quality control procedures to ensure the integrity of instruments and samples.

Transportation, setup, and repeated mobilization of sampling equipment can introduce contamination, and mechanical degradation not typically encountered at fixed stations. What inspection and recertification procedures will be performed before and after each deployment to ensure instrument integrity?	
COMMENT #19	RESPONSE AND ACTION
From: African American Farmers of California, California Agricultural Aircraft Association, California Apple Commission, California Blueberry Commission, California Citrus Mutual, California Cotton Ginners and Growers Association, California Fresh Fruit Association, California Strawberry Commission, California Tomato Growers Association, California Wild Rice Advisory Board, Grower-Shipper Association of Central California, Nisei Farmers League, Olive Growers Council of California, Western Tree Nut Association Will mobile platform data be published in the same data repository as permanent AMN station data, with clear metadata distinguishing mobile from stationary measurements? If mobile data are eventually used to inform permanent station placement, what data quality thresholds must be met before such use is permitted?	The mobile monitoring station will have the capabilities of a standard AMN station while offering flexibility to be deployed to selected study locations for short-term deployments. Once the mobile monitoring station is deployed, it will stay in its location for the duration of the study. The station will collect weekly 24-hour samples following established AMN protocols. DPR maintains the Pesticide Air Monitoring Results (PAMR) Database, which contains both preliminary and published data from monitoring studies conducted throughout California and is updated quarterly. Data from the mobile monitoring station will be incorporated into PAMR. PAMR identifies whether data originates from short term or long-term studies. Data quality thresholds will be consistent with those used in the AMN.
COMMENT #20	RESPONSE AND ACTION
From: Pedro Enriquez My name is Pedro Enriquez and I live in Santa Cruz. While I do not reside in Monterey County, I have a lot of friends and family who liveand Montarey [*sic*] County. I am concerned about the use of organophosphates due to their detrimental health effects on those living near agricultural fields. I want the Ag commissioner to extend the 1/4 mile buffer zone around schools to 1 mile to protect the most vulnerable residents in Monterey County. I would also urge the Ag Commissioner to require Notices of Intent before applying brain-harming organophosphate pesticides. This would allow the Commissioner to make informed decisions about allowing or disallowing their use, but he refused. Currently, the Ag Commissioner does not know	The buffer zones around schools and notice of intent requirements are out of scope of the AMN expansion. However, we do note that a Notice of Intent is required for 3 of the organophosphate pesticides.

about organophosphate use before these pesticides are applied.	
COMMENT #21	RESPONSE AND ACTION
From: Anonymous, Beverly Bean, California for Pesticide Reform (CPR), Dale Hillard, Pesticide Action & Agroecology Network (PAN), Monterey Bay Central Labor Council AFL-CIO, Susan Raycraft Lockwood, Valerie Bengal **Note**: DPR received multiple similar comments recommending a new AMN monitoring station at Salinas. For simplicity, DPR has chosen to include only one representative comment. Monterey County has been excluded due to the CDPR prioritization framework (already one in Pajaro deemed sufficient.) I fully support the expansion in Fresno County to full air monitoring and the proposed new site in Tulare County as priorities. But I remain enraged that you won't consider monitoring pesticides in Salinas. Anyone who lives in Salinas, the Salad Bowl of the World, knows well how much agriculture impacts our economy and way of life. It also impacts our environment and health. I remain concerned that we don't know what we're breathing since CA Dept. of Pesticides Regulation (CDPR) removed our air monitor system for pesticides in 2017. Now both Monterey and Santa Cruz counties rely on data from monitoring in Pajaro (previously Watsonville). That is unacceptable! It is long overdue time to return our air monitor (and hold our agricultural commissioner accountable).	DPR received limited funding in the 2024 Budget Act to support the addition of up to four new monitoring stations, in addition to the planned conversions and/or relocations in Merced and Fresno Counties. California is a large state with a highly diverse range of agricultural commodities, reflecting the variability of its climates, soils, and production regions. To maximize the value of these new monitoring stations, DPR determined it is most effective to place them in areas with agricultural commodities and practices that differ from those represented by existing monitoring sites. Consequently, counties with established monitoring stations were excluded from consideration as potential locations. However, the mobile monitoring strategy document specifically has provisions for sampling in counties with existing AMN stations, if needed.
COMMENT #22	RESPONSE AND ACTION
From: Anonymous Siskiyou County is #5 on your list of priority counties. Since berry starts, alfalfa, and potatoes are all produced there, it would be a great location to check the levels of fumigant and OP release related to varied cropping practices. While the amount of organic agriculture is relatively small, it might be enough to provide comparative analysis and check modeling assumptions.	After reviewing and considering all submitted input, DPR has determined that Siskiyou County will not be selected for a permanent monitoring station.

COMMENT #23	RESPONSE AND ACTION
From: Ana Barrera Why did you take out the air monitor we had in the Salinas Area. You need to prioritize first putting back the ones you took away in 2017. We are the Salad Bowl and more pesticides and Organophosphates are used in Monterey County. Regulate to protect us from harmful exposure from drift. Create a pilot program with local ag commissioner to support local school districts with air monitors at every school that sits within 1 mile from a field.	In 2017, additional funding from a budget change proposal allowed the AMN to temporarily expand from 3 to 8 sampling sites for a 2-year monitoring period. The eight selected sites maintained monitoring in Shafter (Kern County) and added Chualar (Monterey County), Cuyama (Santa Barbara County), Lindsay (Tulare County), Oxnard (Rio Mesa-Ventura County), San Joaquin (Fresno County), Santa Maria (Santa Barbara County), and Watsonville (Ohlone elementary, Monterey County). The additional funding expired in 2020. Given the loss of allocated funds for this project, CDPR was unable to continue operation of eight monitoring sites; therefore, CDPR has reevaluated reported California pesticide use data to identify four monitoring sites to continue with AMN monitoring operation in 2021 and beyond.
COMMENT #24	RESPONSE AND ACTION
From: Courtney Turkatte DPR should also consider community insight and lived experience to include community members in the placement to promote community health protection. In addition, wind direction should also be considered, so monitoring sites are downwind of areas with high usage of fumigants and organophosphates.	DPR recognizes the value of incorporating community insight and lived experience when identifying monitoring locations to support community health protection and DPR is opening a second comment period to solicit feedback on placement of the AMN stations within each selected county. These considerations were included, alongside technical, scientific, and regulatory criteria, in the analysis used to select monitoring sites. For each proposed community being considered for inclusion in the AMN within the four selected counties, wind roses depicting overall wind speeds and directions from the nearest meteorological station will be provided.
COMMENT #25	RESPONSE AND ACTION
From: Courtney Turkatte Recommend placement of an air monitor at Cunningham Elementary School in Stanislaus County based on pesticide use patterns identified using the Department of Pesticide Regulation's (DPR) method and consideration of prevailing wind direction.	After the site selection procedure, DPR is considering Stanislaus County for an AMN monitoring station. Eight communities in the county have been prioritized: Airport, Bret Harte, Bystrom, Denair, Hickman, Parklawn, Rouse, and Westley.

Given the high fumigant and organophosphate usage is at Cunningham Elementary School, shown in red, we recommend citing [*sic*] the new Air Monitor at this location. Moreover, since this site is downwind of many pesticide usages in Stanislaus, it highlights potential cumulative impact of fumigants and organophosphates.	Denair was initially included as a potential expansion site; however, it was excluded due to its proximity to the Delhi AMN station in Merced County. Sites within 10 miles of an existing site in a neighboring county are excluded from consideration due to overlap in source areas (please see response to comment #3). Cunningham Elementary School in Turlock, CA is less than 10 miles from the Delhi AMN station. Given this proximity, the school has not been prioritized for an AMN station.
COMMENT #26	RESPONSE AND ACTION
From: TriCal Group of Companies (TSS) As DPR considers expanding the AMN, it may be helpful to evaluate the point at which additional monitoring yields diminishing returns in terms of new insight into potential exposure and risk. While expanding the number of monitoring locations will increase the volume of data collected, each additional station may provide incrementally less new information if it is placed in areas with similar use patterns, crops, and environmental conditions as existing sites. In this context, an important consideration is whether the current network already provides sufficient representative coverage of high-use agricultural regions. If so, the marginal benefit of additional stations may be limited relative to the cost and complexity of expanding and maintaining the network. Ambient air monitoring is inherently resource-intensive, requiring specialized equipment, ongoing maintenance, laboratory analysis, and staff time for data collection, management, and interpretation. As DPR evaluates potential expansion, it may also be appropriate to consider how available program resources can be deployed most effectively to achieve the greatest overall public health benefit. Programs such as the AMN are supported through registrant-funded assessments, underscoring the importance of ensuring that resources are allocated in a manner that maximizes overall effectiveness. In this context, balancing investments in monitoring with other strategies—such as outreach, mitigation refinement, continued improvements in application technologies, and targeted research—may help achieve the greatest overall benefit.	California is a large state with a highly diverse range of agricultural commodities, reflecting significant variation in climate, soil conditions, and production regions. Due to the state's size and diversity, there are areas with pesticide use patterns that are not fully captured by current monitoring efforts. Additional monitoring sites will allow DPR to obtain more comprehensive information about pesticide use in these areas. The Legislature has provided DPR with funding for up to four additional AMN monitoring stations, as well as the expansion of two sites, to provide the department more information for its continuous evaluation of pesticides. Every three to six years, DPR evaluates communities across the state using the established site selection procedure and the most current PUR data. The goal of this process is to identify locations where deploying monitoring stations would be most effective. This process will guide decisions regarding potential additions to the AMN and will help assess the effectiveness of existing monitoring stations in supporting DPR to evaluate potential health risks, develop measures to mitigate risk, and determine the effectiveness of current regulatory requirements.

While TSS does not oppose the current proposed expansion, it may be beneficial for DPR to consider how the AMN will be evaluated over time, including what criteria would indicate that the network has achieved sufficient coverage to meet its objectives. Establishing clear benchmarks for program effectiveness can help ensure that future expansion decisions are guided by measurable improvements in understanding or risk reduction. In the absence of such criteria, there is a potential for continued incremental expansion over time without a corresponding increase in actionable insight, which may not represent the most effective use of program resources.	
COMMENT #27	RESPONSE AND ACTION
From: TriCal Group of Companies (TSS) TSS also notes that ambient air monitoring represents one component of California's broader pesticide regulatory framework. Protection of public health is achieved through a comprehensive system that includes pesticide labels, DPR regulations, and county-level permitting and oversight, all of which impose enforceable requirements and mitigation measures that apply statewide. These protections are not dependent on the presence of a monitoring station. As DPR considers expanding the AMN, it will be important to clearly communicate the role of monitoring within this broader framework. The presence or absence of a monitoring site should not be interpreted as an indicator of whether a community is protected. Without clear communication, there is a risk that expanded monitoring could unintentionally create the perception that protection is tied to monitoring coverage, rather than the underlying regulatory system. California's pesticide regulatory system has evolved over time to incorporate site-specific conditions, regional differences, and advances in scientific understanding. County Agricultural Commissioners play a key role in implementing and enforcing these requirements at the local level.	AMN data, as part of DPR's ongoing evaluation of pesticide risks, enable DPR to determine whether pesticide product label restrictions and California's required mitigation measures are effectively addressing risks to human health and the environment. DPR's Continuous Evaluation is a statutorily required process in which the department reviews new information regarding pesticide risks and their potential impacts. This information is used to assess current risks associated with pesticide use and to evaluate the effectiveness of existing mitigation measures, as well as to identify whether additional restrictions may be necessary. DPR agrees that clear communication about the role of monitoring within the broader regulatory framework is essential. DPR will continue to expand its public engagement efforts to ensure that communities understand how monitoring data fit within the overall pesticide regulatory system and how statewide health protective measures are developed.

To the extent that monitoring data identify opportunities for refinement, TSS encourages DPR to continue working collaboratively within this existing framework to ensure that any adjustments are targeted, efficient, and consistent with established regulatory authorities. Leveraging existing tools and processes will help avoid duplication and ensure that any changes are implemented in a manner that is both effective and practical.	
COMMENT #28	RESPONSE AND ACTION
From: Anonymous, Tulare County Coalition Advocating for Pesticide Safety (CAPS) Thorough engagement with community is a [*sic*] vital and cannot be rushed. We still come across concerned residents who necessitate clear understanding of the Air Monitoring Network program. DPR repeatedly states protecting public health is a high priority, and adds transparency and environmental justice to stated goals; improvements in efforts are duly noted. Please don't undercut your progress by locating 4 new monitors where few know their purpose and limitations. Put your history of tweaking statistics to provide false assurance behind you. Air monitors should be a tool to evaluate when, where, and how significant reductions in hazardous pesticides is being achieved. Let's put them where that can be done in concert with engaged communities whose residents share that goal.	The AMN Site Selection SOP outlines the methods used to prioritize communities for the placement of new AMN monitoring stations, including updates to the selection approach. Data collected through the AMN are uploaded to DPR's Pesticide Air Monitoring Results Database, which includes both preliminary and published data from monitoring studies conducted throughout the state and is updated quarterly. DPR releases an annual AMN report, and alongside each report, DPR holds community meetings to provide additional information and context regarding the AMN results. DPR remains committed to providing accurate and transparent information and to fostering meaningful engagement with communities and stakeholders. Collaboration with communities are essential to our mission and supports our efforts to protect human health and the environment.
COMMENT #29	RESPONSE AND ACTION
From: Karen Cameron, California for Pesticide Reform (CPR), TriCal Group of Companies (TSS), Tulare County Coalition Advocating for Pesticide Safety (CAPS), Valerie Bengal **Note**: DPR received multiple similar comments about the limitations of the AMN. For simplicity, DPR has chosen to include only one representative comment. Our main concern is that California spans over	State law (Food and Agricultural Code section 12824) requires DPR to continuously evaluate pesticides currently registered in California. Continuous evaluation includes a variety of data reviews and monitoring conducted by DPR including tracking pesticide illnesses, ecosystem monitoring, reviewing pesticide use data, collection and testing the air, groundwater, and surface water in areas across the state. These efforts inform actions such as regulatory changes, label revisions, and other mitigation measures.

155,859.2 square miles and permits the use of nearly 180 million pounds of pesticides every year—many of these known to harm human health and the environment beyond the target species. A program with only 10 monitors, measuring 35 pesticides and 5 breakdown products out of over 1,000 registered pesticides in the state (less than 3.5%), is gravely insufficient to meaningfully assess air quality or protect public health. Furthermore, air monitoring is only one component of evaluating potential pesticide exposures and risk. The presence of a monitor does not provide assurance of safety, nor does the absence of measured spikes guarantee absence of risk. More fundamentally, given the high costs and significant practical limitations of monitoring pesticide exposure, permitting the use of such vast quantities of these chemicals to grow our food is unjustifiable.	Multiple chemical and environmental factors influence a pesticide's potential to move into ambient air. Because not all pesticides exhibit these properties, the AMN prioritizes pesticides with characteristics that make airborne transport more likely. Long term air monitoring is resource intensive, and DPR received limited funding in the 2024 Budget Act to convert Delhi and Parlier stations into AMN stations and to establish four additional new AMN monitoring stations. To maximize the value of these stations, DPR determined that placing them in areas with the highest pesticide use densities would be most effective. By focusing on high use areas, DPR can develop mitigation measures that provide protection statewide, including in lower use areas, by addressing the most challenging scenarios.
COMMENT #30	RESPONSE AND ACTION
From: TriCal Group of Companies (TSS) Modeling tools are designed to be health-protective and to evaluate a wide range of conditions, including those that may not be directly captured through monitoring. These tools allow DPR to assess potential exposures across different geographies, use patterns, and environmental conditions, including areas where monitoring is not present. Monitoring, in turn, plays an important complementary role by providing real-world data that can be used to confirm that modeled assumptions and mitigation measures are functioning as intended. In this way, monitoring serves as a validation tool within a broader risk assessment framework. As such, while additional monitoring may provide further confirmation of existing findings, it is unlikely to fundamentally alter the underlying risk assessments already established through modeling and long-term monitoring data. TSS emphasizes the importance of careful interpretation of monitoring data, particularly as additional data are generated and shared with the public.	DPR values both modeling and monitoring, as each plays an important role in the continuous evaluation of pesticides. AMN monitoring data are assessed against established screening and regulatory targets to determine whether additional mitigation measures may be necessary. DPR applies quality assurance and quality control procedures to ensure that AMN data are reliable and scientifically sound. DPR remains committed to providing accurate and transparent information. To support data transparency, AMN monitoring results are made publicly available and are presented in a manner that promotes clear and accurate interpretation by the public and stakeholders.

The detection of a pesticide—or an elevated concentration during a given sampling period—does not, on its own, indicate that individuals have potentially experienced harmful exposure or that health-based thresholds have been exceeded over relevant exposure durations. Similarly, individual monitoring results do not necessarily indicate that existing mitigation measures are ineffective. Monitoring data are most informative when evaluated over appropriate timeframes and in the context of established health-protective benchmarks, which are often based on long-term or repeated exposure assumptions. Short-term variability or isolated measurements should therefore be interpreted cautiously and within the broader dataset. Providing clear context around how monitoring data should be interpreted will be important to ensure that results are understood accurately and are not mischaracterized.	
COMMENT #31	RESPONSE AND ACTION
From: Anonymous, California for Pesticide Reform (CPR) During the PREC presentation, the presenter erroneously said the Pajaro monitor was previously known as “Royal Oaks”, and that it is in Watsonville, while it is actually in the unincorporated town of Pajaro. Please correct this in order to avoid confusion among the public. The presenter highlighted the relocating and renaming of the air monitor closest to me, renaming it the Pajaro monitor, saying that it used to be referred to as Royal Oaks. While Pajaro, the unincorporated town, is its new location, and it is actually in the Pajaro Valley, DPR previously referred to it as the Watsonville monitor. Since the prior location at Ohlone school might not have accurately reflected levels in the Pajaro Valley, it will be interesting to see if the location change does change values recorded.	Prior to the Ohlone site being designated as an AMN monitoring location, the California Air Resources Board (CARB) conducted a Toxic Air Contaminant monitoring study at the same location, which was referred to as the Watsonville site. When DPR later established an AMN monitoring station at Ohlone Elementary school, the name “Watsonville” was retained. Over time, this naming convention caused confusion because Ohlone Elementary School is not located in Watsonville. To address this issue, DPR changed the site description to “Ohlone Elementary located in Royal Oaks, part of the Watsonville greater area,” reflecting the community in which the school is located (DPR 2023).
COMMENT #32	RESPONSE AND ACTION

From: California for Pesticide Reform (CPR) While we are grateful for the extended comment period, a three-week lead time for a Public Workshop on the AMN Expansion is quite limited—especially given that this time of the year often coincides with Spring breaks. Communities currently not included on your list of potential locations (such as Patterson and Lindsay) may benefit from a more thorough explanation of the Air Monitoring Network program.	Thank you for the comment. DPR is incorporating a second, longer comment period focused on local engagement prior to siting the new AMN stations.
COMMENT #33	RESPONSE AND ACTION
From: California for Pesticide Reform (CPR) We request that in addition to the list of monitored pesticides, and identification of those no longer registered, AMN presentations should also provide important contextual information, such as the proportion of pesticides monitored relative to those used in California.	DPR appreciates the recommendation to include a list of monitored pesticides, identification of pesticides no longer registered, and proportion of pesticides monitored to those used in California in AMN presentations. DPR agrees that providing this context can help improve public understanding of AMN monitoring data and how the data relates to pesticide use in California. DPR will incorporate this type of information into future AMN presentations to support clearer and more comprehensive communication with the public and stakeholders.
COMMENT #34	RESPONSE AND ACTION
From: California for Pesticide Reform (CPR), Tulare County Coalition Advocating for Pesticide Safety (CAPS) DPR should add to the list of AMN objectives: “Investigate likely causes of detected high pesticide concentrations (or "spikes"), and report the findings of those investigations to the public”. The presenter at the PREC meeting on March 20, 2026 said this is implicit; it should be explicit. We urge DPR to convey commitment to looking at high detected pesticide concentrations when these situations arise. While this already may be in the plans, we need DPR to be clearer on this.	Thank you for your comment. Data collected through the AMN is an important part of our continuous evaluation of pesticides risks and informs regulatory work. When concentrations exceed regulatory thresholds or screening levels, DPR will evaluate the cause of the high concentration to determine if additional action is necessary or if regulatory restrictions are working as anticipated. We appreciate the comment about clear communication and will continue to emphasize how this data informs our broader continuous evaluation and regulatory programs in public communication and in annual AMN reports.