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CAUSE
Central Coast Alliance United
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Families Advocating for Chemical
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A project of
Center for Environmental Health


CENTER FOR
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BINATIONAL CENTER FOR THE DEVELOPMENT
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CONEJO CLIMATE
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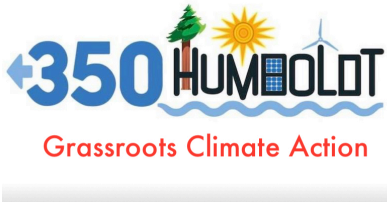
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Grassroots Climate Action


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NON·TOXIC NEIGHBORHOODS


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AS YOU SOW


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Insectaries, Inc.
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NEVADA COUNTY
FOOD POLICY
COUNCIL


FARMS to GROWING


Community
Environmental
Council
50
YEARS
BOLD CLIMATE ACTION


LEADERSHIP COUNSEL
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PSR LA
Physicians for
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Los Angeles


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BEACH CITIES
FLIP THE HOUSE


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CENTER FOR
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Non Toxic
Communities


California
Environmental
Justice
Coalition
CEJC

November 9, 2021

To: Deputy Secretary Amanda Hansen
California Natural Resources Agency (CNRA)
Submitted to: CaliforniaNature@resources.ca.gov and icarp@opr.ca.gov

Re: Draft Natural and Working Lands Climate Smart Strategy and Draft California Climate Adaptation Strategy

Dear Deputy Secretary Hansen,

The undersigned 67 groups strongly support the inclusion of safer pest management, and other strategies that transition California agricultural systems away from harmful pesticides, in the Draft Natural and Working Lands Climate Smart Strategy and Draft California Climate Adaptation Strategy. California's ability to adapt to and mitigate climate change strongly depends on strategies that minimize synthetic pesticide use and center impacted communities.

However, **the draft Strategies do not go far enough in setting ambitious targets that would transition our agricultural systems away from toxic pesticides** and towards safer and more climate-friendly alternative agricultural systems like agroecological and organic agriculture. We urgently need this paradigm shift towards diversified agroecological farming in order to promote public and soil health, food sovereignty and farmer and farmworker livelihoods.

Research shows **climate change will most likely result in increased synthetic pesticide use** due to decreased efficacy of pesticides and increased pest pressure.[i] These findings are highly concerning, given pesticides are already applied on cropland in California at a rate 4.5 times higher than the national average.[ii] At the same time, many synthetic pesticides are a source of greenhouse gas emissions[iii] while alternative agriculture systems that limit synthetic pesticide

use, like organic farming, have been shown to significantly increase carbon sequestration in soils in multiple field trials in California.[iv]

Communities that would bear the brunt of an increase in pesticide use, such as farmworkers, are also those most likely to experience compounded health risks from climate change, such as exposure to extreme heat and poor air quality from wildfire smoke.[v] Farmworkers are also land stewards, directly involved in growing and harvesting food. They therefore must be considered an integral part of the transition to safer, more sustainable and agroecological farming.

We strongly support the "Opportunities to Scale Action" section in the Natural and Working Lands Climate Smart Strategy that emphasizes farmworker land management support, training, and apprenticeships, and urge CRNA to continue fleshing out specifically how such programs can be implemented and shaped by farmworker priorities and engagement. However, both Strategies could do more to center agricultural communities and how they will be affected by climate change – for instance, farmworkers are not mentioned at all in the Draft California Climate Adaptation Strategy.

We recommend the following amendments to the Draft Natural and Working Lands Climate Smart Strategy and Draft California Climate Adaptation Strategy in order to ensure they are inclusive of impacted communities and accelerate California's transition away from toxic pesticides:

- **Include an ambitious pesticide reduction target to 1) reduce the use of synthetic pesticides by 50% by 2030 and 2) reduce the use of hazardous pesticides by 75% by 2030, starting with organophosphates, fumigants, paraquat and neonicotinoids.**
- Explicitly support organic and agroecological systems as climate resilience and mitigation strategies. Incentives should include comprehensive support for organic transition that expands beyond "plans development." Such support should include direct financial incentives and more technical assistance providers with a specialization in organic and agroecology – with priority to serving socially disadvantaged farmers. **We recommend a statewide target of transitioning 30 percent of California's agricultural acreage to organic by 2030.**
- Include specific strategies that protect farmworker health and safety in the context of chemical pesticide use, extreme heat and air quality risk from wildfires as a result of climate change (for example, a climate emergency relief fund for undocumented workers, and support for community-based organizations to build climate resilience in farmworker communities.) CNRA staff should also **ensure that processes for public input on climate-related strategies are inclusive of farmworkers and other Latinx agricultural communities** with Spanish accommodations for all feedback mechanisms.

Thank you for the opportunity to comment. We are happy to discuss any of these recommendations with CNRA staff.

Sincerely,

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McGrath Family Farm

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