



CCOF

Organic Certification

Education & Outreach

Political Advocacy

Promotion

Attention: Laura Petro, Senior Environmental Scientist
Statewide Program Draft PEIR Comments
California Department of Food and Agriculture
1220 N Street, Suite 221
Sacramento, CA 95814

October 31, 2014

Dear Laura Petro:

Thank you for the opportunity to comment on the Draft Program Environmental Impact Report (PEIR) for the California Department of Food and Agriculture's (CDFA) Statewide Plant Pest Prevention and Management Program.

California Certified Organic Farmers (CCOF) is a nonprofit organization and an organic certification agency located in Santa Cruz, California. CCOF certifies and advocates on behalf of its 2,700 members throughout the United States, and it represents about 2,300 organic farmers and ranchers in California.

CCOF originally supported the development of a draft PEIR for CDFA pest prevention and management activities because it could lay the groundwork for efficient, responsible Integrated Pest Management (IPM) programs and techniques. However, CCOF now has serious concerns that the draft PEIR lacks adequate consideration of organic agriculture and fails to properly assess the potential impacts on California's organic farmers.

Public Notification

Under Section 2.4.2 titled Public Notification, CCOF requests that CDFA add a requirement to maintain a readily accessible, current map of certified organic operations because the map would help clarify the breadth of impact mandatory sprays would have on organic operations. CDFA could base this map upon its organic registration data and use the map as a reference when it considers mandatory sprays to manage an invasive species.

Additionally, CDFA should develop specific procedures or guidelines to notify certified organic producers when prohibited materials must be applied.

Program Management Practices

CCOF requests that the second bullet point under MP-SPRAY-1: Conduct a Site Assessment (p. 2-26) be amended to include "proximity to certified organic operations." This is an important consideration because pesticide drift can negatively impact farmers' ability to grow and sell organic crops.



Current Pest Management Program

CCOF shares CDFA's interest in stopping the spread of Asian citrus psyllid (ACP) and its associated disease, citrus greening. However, CCOF does not support application of neonicotinoid insecticides. Under Section 3.4.1 titled Asian Citrus Psyllid and Huanglongbing, CDFA recommends soil drenches or tablet insertion of the neonicotinoid pesticide imidacloprid as an eradication treatment for ACP. As CDFA acknowledges in Appendix J, Potential Effects of Pesticide Use and Other Stressors on Pollinators and Associated Biological Resources, neonicotinoid pesticides are highly toxic to honeybees and other pollinators. These pesticides persist in soil for months and could be taken up by crops long after application.

The National Pesticide Information Center's technical fact sheet on imidacloprid indicates that its half-life in agricultural soils can range from 40-124 days, with the longer breakdown period associated with soils recently amended with organic fertilizers. If imidacloprid is applied as an eradication treatment for ACP, then it could cause lingering pesticide residues in organically-farmed soil, which impacts the ability of organic farmers to grow and sell their crops into the premium organic market.

Environmental Setting and Impacts Analysis

CCOF commends and thanks CDFA for its effort to characterize organic agriculture in California. As documented in the federal Census of Agriculture, organic farmgate sales in the state totaled over \$1.3 billion in 2012. However, economic measures cannot encompass the full range of benefits and resources that organic agriculture contributes to California. Organic agriculture also improves soil quality, supports biodiversity (including beneficial insects that help control crop pests), supports pollinator health, and mitigates climate change.

Impacts Analysis

CDFA should not implement a single significance criteria in the draft PEIR. Instead, a species- and situation specific evaluation of the significance criteria should be developed in species-specific EIRs. The Significance Criteria set forth under Section 6.1.3 narrowly defines significant impacts as the conversion of agricultural land to non-agricultural uses. Although based upon Appendix G of the CEQA Guidelines, conversion of agricultural land to non-agricultural use is not the only impact possible on agricultural resources and economics. This analysis should be augmented with an economic analysis of reduced access to markets and sales, which would occur when certified organic farmers are subjected to mandatory sprays.

Chemical Management Approaches

CCOF encourages CDFA to recognize that research is ongoing to develop organic pest management options. The draft PEIR states that eradication or control of certain pests, such as the glassy-winged sharpshooter and Asian citrus psyllid, would not be possible with currently available organic options. A sweeping statement that no organic options are available now may be false or misleading for imminent and future eradication and control efforts.

Moreover, a broad statement that no organic options are currently viable for certain pests could stifle organic research and control efforts. In many cases, when viable organic control options do not exist, viable conventional control options also do not exist. For example, researchers continue to develop both organic and conventional management techniques for Asian citrus psyllid. We hope that CDFA will be our partner in strongly encouraging rather than stifling the amount of research dollars and efforts put toward organic control methods by recognizing ongoing organic research and development.

Additionally, the draft PEIR incorrectly characterizes how quarantines and pesticide drift would disrupt organic farming. The draft PEIR underestimates the impact of chemical use on organic farmers' ability to sell into the organic marketplace. Organic growers face significant economic losses when mandatory sprays are applied. While the national organic standards specify that an operation's certification status will not be affected if prohibited substances are applied due to a Federal or State emergency treatment program, a high degree of expense, care, and planning—including but not limited to developing organic systems plans, working with organic inspectors, paying fees, completing paperwork, implementing soil and natural resource conservation practices—goes into organic production. The draft PEIR should not underestimate the burden placed on organic growers if they must find new buyers or new marketplaces for treated crops or sell their crop at a lower price than it would ordinarily command.

Finally, the draft PEIR assumes that the impact on organic growers would more likely be the conversion to non-organic production rather than to non-agricultural use. However, many organic growers would consider taking land out of production rather than convert to conventional production. And the draft PEIR does not cite any evidence or research that suggest organic land would be more likely converted to conventional production than converted to non-agricultural use. Although no evidence or research is cited, the finding of no impact for several portions of the draft PEIR rests on the assumption that land would simply be converted to conventional. Thus, CCOF requests CDFA research and explain this assumption further before including it in the draft PEIR because it has resulted in several findings of no impact where CCOF sees significant potential impact.

Cumulative Impacts

The draft PEIR underestimates the likelihood of conversion to non-agricultural use as a result of pollinator loss. If pollinator services are reduced due to application of pesticides that disproportionately impact honeybees such as neonicotinoids, California could very well see removal of land from agricultural production.

USDA Organic Pesticide Alternatives

CCOF appreciates the organic alternatives in the draft PEIR but again cautions the CDFA from assuming that no organic controls can or will exist. For example, researchers are actively researching organic management of pests such as ACP. CCOF encourages CDFA to reach out to extension agencies, organic researchers, and organic certifiers for updates on organic control options. For example, on page 7-9 under the heading ACP Biopesticides, the draft PEIR does not



acknowledge a new product, Venerate (active ingredient *Burkholderia spp.* strain A396) from Marrone Bio-Innovations, that was registered for ACP in California in August 2014.

Additionally, the USDA Organic Pesticide Alternative does not acknowledge the full scope of organic practices that can contribute to pest management. The current proposed USDA Organic Alternative only considers the use of USDA Organic approved inputs. However, an organic alternative should also include the broad array of practices such as soil building practices and natural resource management, which promotes healthier plants resistant to pesticides and biodiversity to foster natural predators.

If CDFA does expand its UDSA Organic Pesticide Alternative to encompass the full range of organic pest management practices, then CDFA should also expand its climate change assessment of organic alternatives. Organic farming practices can increase organic soil carbon stocks and decrease greenhouse gas emissions. According to a 2014 white paper from the Rodale Institute, organic farming can sequester more than 100% of current annual CO₂ emissions. See *Regenerative Organic Agriculture and Climate Change* from the Rodale Institute, <http://rodaleinstitute.org/regenerative-organic-agriculture-and-climate-change/>.

Conclusion

CCOF has supported a draft PEIR for CDFA pest prevention and management activities because it could lay the groundwork for efficient, responsible Integrated Pest Management (IPM) programs and techniques. However, CCOF encourages CDFA to give more robust consideration to organic agriculture in this draft PEIR.

CCOF thanks you for the opportunity to comment and is available for further information and clarifications.

Sincerely,



Kelly Damewood
Policy Director, CCOF

