



November 10, 2023

Julie Henderson, Director
California Department of Pesticide Regulation
1001 I Street
Sacramento, CA 95812

Re: NRDC Comments on Department of Pesticide Regulation Draft Strategic Plan 2024-28

Submitted via DPR's public comment portal

Dear Director Henderson:

On behalf of the Natural Resources Defense Council (NRDC) and the NRDC Action Fund, and our hundreds and thousands of members and activists, we appreciate the opportunity to provide feedback on the California Department of Pesticide Regulation (DPR) Draft Strategic Plan 2024-2028 (“the Plan”).

We support the updated mission, vision and core values in the Plan, especially the mission element which lifts up sustainable pest management as an integral framework for DPR operations. We agree that DPR's function as an agency is to protect public health and the environment, and that the combination of adopting a sustainable pest management lens and effective regulation are key to accomplishing this. However, to put the mission, vision, and values into action, DPR should explicitly incorporate the outcomes, timelines, and priorities of the Sustainable Pest Management Roadmap¹ (“Roadmap”) into the Plan. In its current iteration, the Plan's goals and timelines do not sync with the Roadmap, and the Plan also offers a new array of objectives; this disconnect has left the public wondering how these two documents relate to one another.

In comments previously provided to DPR as part of the Sustainable Pest Management Roadmap process, NRDC urged the agency **to commit to comprehensively adopting a sustainable pest management approach across its programs and operations, and achieve the goals set out in the Roadmap.**² We also highlighted the need to implement the Roadmap goals across the whole of government, especially in partnership with other California agencies including the Department of Food and Agriculture (CDFA), the Air Resources Board (CARB), the Office of Environmental Health Hazard Assessment (OEHHA), and the Natural Resources Agency (CNRA).

¹ Accelerating Sustainable Pest Management: A Roadmap for California (Jan. 2023), available at https://www.cdpr.ca.gov/docs/sustainable_pest_management_roadmap/spm_roadmap.pdf.

² NRDC Comments on the SPM Roadmap are attached below.

Align Strategic Planning with the Sustainable Pest Management Roadmap

Given the urgent need to pivot toward a new sustainable pest management (SPM) paradigm, DPR should align its Plan with key goals in the Roadmap. These include:

- By 2024, relevant state agencies and departments have the funding, staffing, and mission to advance the goals of SPM.
- By 2024, California should have in place strong multistakeholder bodies at the state and regional levels to ensure that activities to advance SPM in agricultural and urban contexts are well-coordinated and collaborative, working together to reduce unintended negative consequences and enhance co-benefits. (The Plan does include an objective to establish an SPM advisory group, but it is unclear how this advisory group will relate to the state and regional multistakeholder bodies or whether these are in fact the same entity.)
- By 2024, fund and launch a 3-5 year, \$6-10 million public awareness campaign, or multiple campaigns, focused on building public understanding about pesticide risks and impacts, SPM and its principles, and the need to shift the public's mindset about pests. Identify key issues and audiences, research key obstacles and leverage points, and develop high-quality campaigns focused on these findings, with metrics and adequate funding.
- By 2025, as a first step in implementing these priorities, the SPM Work Group and Urban Subgroup call on the state to develop a plan, funding mechanisms, and programs to prioritize pesticides for reduction, and to support the practice change necessary to transition away from the use of high-risk pesticides in agricultural and nonagricultural settings.

The last bullet above is perhaps the most important element for DPR to address in an urgent matter. This relates to Goal 1.3 in the Plan, but again, the current draft of the Plan misses an opportunity to advance SPM by aligning with and incorporating crucial timelines established in the Roadmap. Ultimately, the goals, objectives and timeframes of the Roadmap should serve as the backbone of the Plan, with the latter offering a detailed implementation pathway to be realized over the next five years.

Commit to Whole of Government Collaboration

While DPR bears primary responsibility for regulating pesticides in California, the agency must collaborate closely with CDFA, CARB, OEHHA, and CNRA in implementing its next strategic plan. This commitment to partnership is not reflected in the current draft.

DPR is best served when it relies on the expertise of sister agencies to advance its own work. We are concerned that the Plan proposes to duplicate the work of CARB and OEHHA, which risks delaying essential progress in achieving Goal 1.3, especially around human health and environmental risk assessments. In 2024 and beyond, DPR should plan to work closely with CARB and CDFA to implement 2022 Scoping Plan commitments related to expansion of organic acreage in California and pesticide use reduction. The Scoping Plan is clear that both

are key strategies to reducing short-lived climate pollutants and increasing soil water holding capacity.³ It states that “Ramping up increased healthy soils practices and increasing organic agriculture in California will require continued and sustained implementation by private industry and public agencies.” DPR is a key implementing agency to lead this process, in close collaboration with partners at CDFA, and DPR’s Plan should reflect a reciprocal commitment.

Given the state’s significant investments and commitments to expanding organic agriculture as a climate strategy, we are concerned that DPR is embarking on a path that competes with, rather than includes, organic in the work it proposes through Goal 1.1. In fact, in the 2022 Scoping Plan CARB states, “The implementation of climate smart agricultural practices and diversified organic agriculture can help California achieve social and environmental benefits, like improving water use efficiency, increasing pollinator habitat, and reducing synthetic fertilizer and pesticide use.” CARB’s intentions here are clear: that expanding organic farming in California is a key strategy to reduce pesticide use. At a minimum, DPR needs to specify in its Plan how the state’s work on organic expansion, and defining regenerative agriculture, relates to any procurement strategies it plans to develop to implement SPM. DPR should not create a program that competes with organic or creates confusion in the consumer marketplace. Any work conducted under this goal must be done in close collaboration with CARB and CDFA to ensure that DPR isn’t working at cross purposes.

Similarly, CNRA is currently undertaking the process of establishing statewide targets – to be finalized by January 1, 2024 – to implement AB 1757, focusing on nature-based climate solutions. Advocates, including NRDC, support the inclusion of pesticide use reduction goals for all natural working lands as part of this process. This serves as another opportunity for DPR to collaborate with agency partners in helping to advance its own SPM goals. Yet there is no mention of this live opportunity in the Plan.

DPR’s Plan also lacks specificity on how the agency will work with OEHHA to identify and assess priority pesticides. This work is the backbone of OEHHA’s expertise and role as an agency; its core mission is to protect environmental and human health through its scientific assessments. Given DPR’s updated mission to “protect human health and the environment...” we urge the agency to rely on the existing list of priority pesticides that it co-created with OEHHA and move forward with SPM implementation. The Plan’s Goal 1.3, which proposes to develop and implement a prioritization process, is duplicative, inefficient and exacerbates harm to environmental justice communities that are exposed to these harmful chemicals at work and in their communities on a regular basis.

The Plan needs to instead clarify how it will build on the relevant work of OEHHA, CNRA, and other state departments to advance its own SPM goals.

Incorporate Pesticide-Treated Seeds into Strategic Plan Goals

As detailed in NRDC’s comments on the SPM Roadmap,⁴ DPR must ensure that its programmatic goals apply to pesticide-treated seeds that currently escape regulation by DPR. DPR’s failure to consider treated seeds to be pesticides means that the agency is largely

³ 2022 Scoping Plan for Achieving Carbon Neutrality, California Air Resources Board, available at <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>

⁴ See supra n. 2.

ignoring a large and growing use of pesticides statewide, undermining its ability to achieve the goals stated in the Strategic Plan.

Regulating pesticide-treated crop seeds is relevant to all draft Strategic Plan goals, but fundamentally critical to “Goal 2: Track, Evaluate, and Enforce Safe Pesticide Use.” DPR’s existing policy thwarts all efforts to track, evaluate, and enforce restrictions on use of treated seeds. In fact, DPR itself has acknowledged that “pesticide-treated seeds may introduce a significant contribution of pesticide mass that remains unreported in PUR.”⁵ Accordingly, the Strategic Plan should explicitly incorporate tracking and mitigation of widespread treated seed use.

Conclusion

In addition to the recommendations offered herein, we urge DPR to prioritize the feedback received directly from members of organizations representing communities most impacted by pesticide use. This will become more established in the culture of the agency starting in 2026, when the AB 652 Environmental Justice Advisory Committee will be constituted. Doing so will be an important way to honor the mission, vision and core values offers in this Plan as well as the agency’s commitment to diversity, equity, and inclusion.

Thank you again for the opportunity to comment, and we welcome continued discussion with you and your staff on these topics to address any further questions or comments.

Sincerely,

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⁵ DPR, Pesticide-Treated Seeds Public Workshop (Nov. 15, 2021), available at https://www.cdpr.ca.gov/docs/emon/surfwtr/pest_seeds/pest_seeds_slides.pdf.



August 16, 2022

Karen Morrison
Acting Chief Deputy Director
California Department of Pesticide Regulation (DPR)
1001 I Street
Sacramento, California, 95814
Submitted Via Email

Re: NRDC Comments on July 2022 Draft Sustainable Pest Management Roadmap

Dear Acting Chief Deputy Director Morrison:

On behalf of the Natural Resources Defense Council (NRDC) and the NRDC Action Fund, and our nearly half a million members and activists across the state, we appreciate the opportunity to provide feedback on the July 2022 draft roadmap developed by the Sustainable Pest Management Work Group & Urban Subgroup (“Roadmap”).

As we shared in meetings with you and your team last month, we are heartened by the opportunities to protect the health of communities and ecosystems highlighted in the Roadmap. **We urge the Department of Pesticide Regulation (DPR) to commit to comprehensively adopting a sustainable pest management approach across its programs and operations, and to achieving the goals set out in the Roadmap.** This approach will also be important to implement across the whole of government, including in California Department of Food and Agriculture (CDFA) programs.

We wholeheartedly agree that a holistic, systems approach to farming is essential at a time when our state faces existential threats, such as climate change and biodiversity loss. Drastic reductions in pesticide inputs across agricultural and urban landscapes, as described in the Roadmap’s “North Star” goals, are critical to mitigate these threats. We appreciate how the concept of Sustainable Pest Management (SPM) is defined in the Roadmap, especially the focus on prevention of pest issues as a foundational principle, the prioritization of agroecological approaches in agriculture context, and the aim of building resilient farming systems that don’t rely on chemical inputs. We also support the inclusive list of co-benefits within the “SPM in Agriculture” section on page 10, though ask that this list be bulleted rather than in letter order, to make clear that all of these benefits are on equal footing and should be prioritized as such.

The “SPM and Climate Change” section on page 13 lays out essential arguments for why California must act urgently to transform its pest management paradigm and be proactive,

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rather than reactive, to the inevitable changes that are expected in the coming years. It is also worth noting in this section that the production and use of pesticide chemicals negatively impacts the climate footprint of California’s agricultural sector; yet another reason to move away from a reliance on chemical pest management and toward ecological approaches.

In order to realize the full potential of the Roadmap, we urge the working groups to address the following in the final draft:

- State the need for a firm commitment by DPR to implement pesticide use reduction for toxic pesticides and all other stated goals, in order to achieve the “North Star” goals
- Shorten the implementation timeline to 2035 or earlier
- Center organic agriculture, an existing and proven systems-based holistic solution, in the “Activate Markets” strategy
- Use existing expert lists and hazard traits to identify pesticides that do not meet the goals of the Roadmap and therefore should be prioritized for replacement (e.g., toxic air contaminants, Proposition 65 carcinogens and developmental and reproductive toxicants, IARC)
- When defining the “yet to be defined” class of pesticides that cause significant harm, the state should consider properties that lead to widespread ecological contamination
- Employ a precautionary approach when "fast tracking" alternatives to high-risk pesticides and identifying "reduced risk alternatives"
- Incorporate biodiversity objectives in pesticide reduction goals (e.g., pollinator or endangered species protection)
- Ensure that all stated goals apply to pesticide-treated crop seeds

Detailed explanations of these recommendations are below.

Recommend a Clear State Commitment to Achieving Goals

The Roadmap offers ambitious goals on page 15, including significant reductions in pesticide-related illness, pesticide runoff, residues and use for certain categories (see below for more on this). We are supportive of these and other goals included in this section. However, the Roadmap should include firmer language urging a state commitment to achieving these goals.

The current language does not state a clear position on the goals of the Roadmap. For example, page 15 states that if the Roadmap is implemented “...California will be able to achieve the following goals.” The Roadmap’s Executive Summary is even more vague, stating that if recommendations are implemented, we would “expect to see” or “intend to achieve.”

We recommend that the Roadmap make a declarative, unequivocal statement about the need for a state commitment to achieving these important goals, such as this:

“California should commit to achieving the following goals through the timely and comprehensive implementation of this Roadmap.”

Language articulating the need for this clear commitment should be reflected in every section of the document, and in all related communication about this effort.

Shorten Implementation Timeline

The Roadmap sets the “North Star” as accomplishing changes by 2050. However, in order for the SPM framework to succeed in advancing agricultural co-benefits listed on page 10, the plans outlined in this Roadmap must be implemented at a much more aggressive pace. A 2050 timeframe is so far out into the future as to be unworkable; we have little, if any, information what our political landscape, our agricultural system, or our climate will be like in nearly 30 years. We urge the workgroups to shorten this time frame so that full SPM implementation happens no later than 2035, the year in which our incoming class of 2023 elected officials will term out of office. This will ensure some measure of accountability within government and from industry groups that participated in the development of the Roadmap. A shorter timeframe will send an important message to the Legislature and future Administrations that this work is a priority for the state. It is also responsive to the urgent need for change that impacted communities have been demanding for years.

In addition, the Roadmap should establish interim implementation benchmarks from 2023 through 2035, at four-year intervals, in order to ensure progress toward the North Star goals. As currently drafted, several of the interim goals that are included lock in too much delay. For example, DPR has until 2025 to develop a process to re-evaluate currently registered pesticides. To meet the goals of this SPM plan, DPR needs a much more aggressive approach that is responsive to emerging science on the harms posed by currently registered pesticides. The Roadmap must also set a robust timeline for completion of assessments and implementation of mitigation measures.

Use Key Public Health Literature and Metrics in Defining “Toxic” Pesticides

There is an extensive body of scientific literature documenting the dangers of working in, and living near, fields where pesticides are applied, particularly for children and pregnant women. Study after study, including many conducted in California, find increased risk of [cancer](#), [Parkinson’s](#), [respiratory disease](#), [learning disabilities](#), [birth defects](#), and [autism](#). This health burden is unequally borne by communities of color in California. A [published analysis](#) of CalEnviroScreen data found that nearly all of the reported pesticide use (95%) occurred in zip codes that were predominantly communities of color.

In order to meet the Roadmap’s goals to reduce the acute and chronic illness caused by pesticide use and advance more racially equitable agriculture in California, pesticides that are linked to health hazards must be prioritized for replacement with safer alternatives. The current evaluation systems have consistently failed to adequately screen and evaluate pesticides in a timely manner, leaving generations of California’s most vulnerable communities at greater risk of death and disease.

The final Roadmap should rely on existing lists describing pesticides with known health threats, such as toxic air contaminants, Proposition 65-listed carcinogens and reproductive and

developmental toxicants, and International Agency for Research on Cancer (IARC). In addition, this list should take a class-based approach where sufficient evidence exists that hazard traits apply to chemically related pesticides. For example, there is evidence that the entire class of organophosphate pesticides are developmental neurotoxicants¹ and emerging evidence suggests the same for the neonicotinoid pesticides.² To achieve the transformation called for in the Roadmap, we need safer alternatives to entire classes of such pesticides.

The final Roadmap should include a comprehensive description of “Toxic Pesticides” in order to build an alternative agricultural system that doesn’t poison workers, communities and the food supply. Use of the pesticides on the lists named above is incompatible with the vision described in the Roadmap.

The Roadmap correctly identifies the need for a continuous evaluation system for currently registered pesticides as a mechanism to achieve its vision of healthier and more equitable agricultural system. However, a significantly more aggressive timeline and description of commitments is needed to meet the goals and vision of the Roadmap. The design guidance should include setting specific (and ambitious) targets for completing pesticide re-evaluations and implementing mitigation measures. In addition, relying solely on existing risk assessment paradigms and procedures will continue to result in risk assessments that fail to capture the burden of disease observed in the epidemiological evidence for California. The design guidance should include the need for evaluations that incorporate the *cumulative* burden borne by agricultural communities, which increase the risk of disease and death because of pesticide exposures. The Roadmap should note that, working with the Office of Environmental Health Hazard Assessment (OEHHA), DPR must revise risk assessment practices to incorporate reforms identified by experts, such as the National Academies.

Incorporate Biodiversity Objectives in Pesticide Reduction Goals

As the Roadmap notes, the SPM Work Group is charged with developing a plan to “minimize the reliance on use of toxic pesticides,” which includes practices to “preserve and protect” biodiversity (page 8). However, no explicit biodiversity objectives—such as protection of critical pollinator populations or threatened and endangered species—appear in the North Star or specific SPM goals. As page 15 notes, some members of the SPM Work Group recommended including pesticides that harm “ecosystem biodiversity and pollinator populations” as one of the “yet-to-be-defined” classes of pesticides identified for a 90% reduction goal. The final Roadmap should include a 90% reduction goal for pesticides harmful to biodiversity—with special consideration for pesticides known to harm pollinators or threatened and endangered species, such as glyphosate and neonicotinoids. The SPM Work Group should also consider incorporating other biodiversity objectives into the SPM goals—such as greater pesticide

¹ See, e.g., Irva Hertz-Picciotto et al., “Organophosphate Exposures during Pregnancy and Child Neurodevelopment: Recommendations for Essential Policy Reforms,” *PLOS Medicine* 15, no. 10 (Oct. 24, 2018): e1002671, <https://doi.org/10.1371/journal.p>.

² See Wenchao Han et al., “Human exposure to neonicotinoid insecticides and the evaluation of their potential toxicity: An overview”, *Chemosphere* 192:59-65 (Feb. 2018), <https://doi.org/10.1016/j.chemosphere.2017.10.149>.

reductions in biodiversity hotspots or habitat for the recovery of particularly sensitive species, or metrics related to the recovery of keystone species harmed by pesticides, including pollinators.

Prioritize Organic Agriculture in SPM Strategy

Missing from this document and its implementation strategy is the fact that organic agriculture is foundationally a sustainable pest management strategy. Given that California is the largest organic producer in the country and that thousands of California farmers are also relying on sustainable pest management practices to grow certified organic products, this is a significant oversight. The connection between organic production practices and SPM needs to be clearly articulated in the Roadmap to ensure that our organic producers aren't left behind as implementation strategies are brought to life, and to make it clear to purchasers that organic is a viable and available SPM option. Clearly identifying organic as an SPM strategy will also create better alignment with other state initiatives such as the California Farm to School program, millions of dollars in funding allocated in FY21 and FY22 to support organic transition programs, and recommendations in the latest draft of the 2022 CARB Scoping Plan.

The Roadmap is an ideal opportunity to call for a significant transition to organic agricultural practices in California. To that end, we encourage the Working Group to set a goal in the Roadmap that 30% of California agricultural land is farmed organically by 2030.

We are pleased to see the SPM Working Group recognize institutional procurement as a key lever in expanding markets for SPM and other related agricultural products such as those produced with organic practices. The Roadmap is right to recognize that technical assistance, education and transition support needs to be radically expanded in California in order to achieve the "North Star" goals. Farmers need help with adopting new practices and they need the state to help mitigate the risk that the transition process can bring. As these programs come online, the State should provide greatest resources to small-scale, limited resource, and socially disadvantaged farmers and ranchers to help them shift away from a reliance on pesticide use in their operations.

Prioritizing organic farming as an SPM strategy now will help create the necessary conditions to increase resilience, improve health outcomes, and advance equity in the future.

Ensure SPM Goals Apply to Pesticide-treated Crop Seeds

The Roadmap should ensure that its North Star and specific SPM goals apply to pesticide-treated crop seeds. Pesticide-treated seeds are an already large and growing use of pesticides across the country, with the vast majority of conventional crop seeds receiving some form of pesticide treatment before planting.³ Current DPR policy, however, treats all pesticide-coated

³ See, e.g., Seedway Commercial Vegetable Seed Catalog 2022, 165 ("Our seed, unless specified by the customer, will be treated with our standard seed treatment. Our standard treatment can be one or multiple fungicides depending on the variety; some treatments have insecticides included with fungicides for added protection"), <https://bit.ly/3d9CKyW>.

seeds as not meeting the definition of “pesticide” under state law, and therefore effectively exempt from all related tracking and regulatory requirements.⁴

If DPR persists in maintaining this legal “loophole” for pesticide-treated seeds, achieving the SPM goals identified in the Roadmap will be impossible in practice. DPR’s current policy prevents Pesticide Use Reporting (PUR) database tracking of what is likely one of the largest and most widespread pesticide uses in the state. It also wholly prevents the agency from exercising its existing regulatory authority over the sewing of any pesticide chemical—even highly toxic or problematic pesticides that DPR has refused to register or has otherwise prohibited—into California soil, provided that pesticide crosses state lines on a seed treated out-of-state.

Again, the use of pesticides on crop seeds is substantial and likely growing. For example, a recent [NRDC-commissioned report](#) shows that pesticide seed coatings may account for the single largest use in California of neonicotinoid pesticides—the world’s most widely used insecticides, which are linked with mass pollinator losses, widespread water contamination, ecosystem impacts, and threats to human health—and [DPR’s own research](#) appears to confirm that conclusion. Although much remains unknown in California, studies elsewhere suggest that neonic-seed treatments are most often prophylactic and unnecessary—used near ubiquitously even in absence of pest pressure and without providing any tangible economic benefits to farmers⁵—directly contravening commonly held values of Integrated Pest Management.

Accordingly, the Roadmap’s goals—especially those relating to pesticide reduction and implementation of sustainable practices—must account for the use of pesticide-treated crop seeds if they are to be successful.

Identify Properties that Lead to Ecological Contamination

The working groups have proposed a laudable goal to reduce “pesticide residuals in offsite water, land, and air” by 90%. To achieve this goal, the Roadmap should specifically identify pesticide characteristics that tend to lead to widespread ecological contamination. Such characteristics should include high persistence in the environment and high water solubility. It should also take into account use patterns that lead to widespread, unnecessary use, such as prophylactic use. Use of chemicals where no pest problem is identified is fundamentally antithetical to principles of IPM and SPM. Pesticides with these characteristics, therefore, should be identified as presenting “significant risk” to humans and the environment and included in the “yet-to-be-defined” class of pesticides.

Employ a Precautionary Approach when "Fast Tracking" Alternatives

If California is to implement systemic change that benefits community health and preserves the state’s unique biodiversity, agencies must put a stop to the pesticide “treadmill” that constantly

⁴ See NRDC et al., *Rulemaking Petition to Regulate Crop Seeds Treated with Neonicotinoids and Other Systemic Insecticides* (Sep. 23, 2020), <https://on.nrdc.org/3JwoT1E>.

⁵ See Grout et al., *Neonicotinoid Insecticides in New York State Economic Benefits and Risk to Pollinators* (2020), <https://bit.ly/3BOanjY>.

replaces harmful pesticides with newer, but still harmful, chemistries. To end this pattern, the state must take a precautionary approach when reviewing new products and chemistries.

Throughout the Roadmap, the work groups emphasize the need for increased “efficiency” in permitting new chemistries and “fast-tracking” lower risk alternatives (e.g., pages 22, 23, 51). While NRDC understands the need for efficient review of products, thorough review of chemical replacements is absolutely essential to avoid unforeseen impacts on human health and ecosystems. The history of pesticide approvals is replete with examples of chemistries hailed as safer alternatives to old chemistries, but ultimately found to be equally harmful or harmful in other ways. For example, neonicotinoids were viewed as a safer alternative to organophosphates. Neonicotinoids are now used on hundreds of millions of acres across the nation, and experts are increasingly concerned about the effects of ubiquitous exposure to these pesticides in human populations – to say nothing of their devastating effects on pollinator populations and other wildlife. Accordingly, any changes to the review process intended to fast-track or streamline review should not sacrifice the thoroughness of this critical process.

Conclusion

In addition to the recommendations offered herein, we urge DPR and the working groups to prioritize the feedback received directly from members of organizations representing communities most impacted by pesticide use. This is one important way to honor the values and goals of this project.

Thank you again for the opportunity to comment, and we welcome continued discussion with you and your staff on these topics to address any further questions or comments.

Sincerely,

Lena Brook, Acting Director, Food and Agriculture Program
Dan Raichel, Acting Director, Pollinator Initiative
Miriam Rotkin-Ellman, Senior Scientist, Health and Environment Program
Lucas Rhoads, Staff Attorney, Pollinator Initiative
NRDC (Natural Resources Defense Council)