

**From:** [CDPR\\_PRECComments@CDPR](mailto:CDPR_PRECComments@CDPR)  
**To:** [CDPR\\_dpr22005](#)  
**Subject:** FW: 1,3-D Comment  
**Date:** Friday, November 18, 2022 4:41:13 PM

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**From:** Ione Yuen <IYuen@smcgov.org>  
**Sent:** Friday, November 18, 2022 10:34 AM  
**To:** CDPR PRECComments@CDPR <precomments@cdpr.ca.gov>  
**Subject:** 1,3-D Comment

EXTERNAL:

Hi,

I understand that the studies are attempting to minimize the acute and cancer exposures, but I was wondering if there was any consideration for the needs of the growers. The field fumigation timing is important for the growers to get their crops into the ground. The additional soil moisture requirement in these drought years may be difficult as water is not free for some growers. Our small growers are already struggling make back their costs so have stopped planting this past year. Additional requirements and costs will make it even more difficult. They use the field fumigation for club root fungus and they have reported a 25% yield reduction when they did not fumigate.

The 36 hour separation may create issues for growers as growers may also have restrictions due to School Notification rules which require that they finish 36 hours before school is in session.

Thank you,  
Ione Yuen