From: cdprweb@CDPR
To: CDPR dpr22005
Subject: Fwd: Proposed legislation
Date: Friday, May 26, 2023 12:27:40 PM

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From: Karen Cameron
Sent: Friday, May 26, 2023 12:26:03 PM
To: cdprweb@CDPR <cdprweb@cdpr.ca.gov>
Subject: Proposed legislation

EXTERNAL:

Name: Karen Cameron
Email: 23kcameron@gmail.com
Subject: Proposed legislation
Host: (198.143.34.12)
Phone: 18317709759
Comments:
To : CA Dept of Pesticides Regulation
From: Karen Cameron, concerned citizen
Safe Ag Safe Schools
Date: May 26, 2023
RE: Proposed regulation on the use of cancer-causing 1,3-dichloropropene (1,3-D)

I find it appalling that you would favor the science of the pesticide chemical manufacturer over the California Office of Environmental Health Hazard Assessment (OEHHA). Especially since your jobs are primarily paid for by pesticides mill taxes! (Public perception is that the chemical companies seem to control your decision-making, not the best interests of the public you are supposed to protect!)

You must rewrite the environmentally racist regulation of 1,3-dichloropropene you have put forward for public review. Do I need to remind you that 34 European countries have banned this chemical to protect public health? I call on you to redesign your proposed rule for cancer-causing 1,3-dichloropropene (1,3-D) to follow the official Prop 65 safe harbor level established by OEHHA of 3.7 micrograms per day, as opposed to your current 50 micrograms per day for which the manufacturer Dow Chemical advocated.

DPR's draft rule is designed to keep 1,3-D air concentrations below an average of 0.56 parts per billion (ppb); however, the OEHHA safe harbor level for cancer, which converts to 0.04ppb, is 14 times lower. All parts of the 1,3-D rule must target the level OEHHA toxicologists have determined is safe.
The lives of people in my community are not worth 14 times less than those in non-ag communities. You can't have separate and unequal cancer warning levels: one for non-agricultural communities and a weaker one for majority Latino agricultural communities. That is environmental racism.
Then there are those of us who don't work in the fields, yet are still unfairly exposed. I am a homeowner/retired teacher in Salinas (Salad Bowl of the World with a city motto "Rich in land, rich in values".) Last year, I attended a public planning meeting with Salinas Vision 2040. Among other data shared, we reviewed a map drafted by OEHHA that showed the Pesticides Pollution burden in

Salinas. About 80-90% of Salinas appeared in deep purple (90-100% pesticides accumulation). Since my home is in this area, I wonder if there is a pesticide connection to the severe allergies I have developed (formaldehyde, and others). This caused a ten day hospitalization and referral to Stanford. Or the chronic sinusitis I needed surgery for. Or maybe it was a factor in my pets' health (I've had to put two dogs to sleep, one at only 1 yr old with a rare neurological disorder that slowly shut down all her limbs.)

As a school teacher in Salinas, I saw a disproportionate number of children with asthma, allergies, learning disabilities, autism, ADHD, cancer, and more health problems. It is concerning that so many schools are within close proximity to agricultural spraying.

I feel inclined to speak out for ALL of us affected. First, let's start with the lack of data shared (which has caused public perception of pesticide secrecy). NO statewide pesticides data was shared from 2016 - 2021 until public pressure demanded it. WHY? This data included 2020, with record high use of 216 million pounds of applied active ingredients (AIs) and 106 million cumulative acres treated. California ranks first in the U.S. for agricultural cash receipts ($45.2 billion in 2017). We need to do better!

As for air quality monitoring, California may be the only state that monitors the air for pesticides, but our system is inadequate. For instance, the air monitoring system in Salinas (mass producer of global produce) was removed in 2016. The closest air monitoring system is located near Ohlone Elementary in Watsonville. As noted by EarthWatch in a 2022 letter to Monterey County Agricultural Commissioner, Henry Gonzales, "Ten years of air quality monitoring data from Ohlone Elementary School confirm that pesticide drift at unhealthful levels is rampant. For example, levels of the restricted fumigant 1,3-D measured at Ohlone Elementary School have exceeded the safe harbor level recently set by the Office of Environmental Health Hazard Assessment (OEHHA) in every year going back to 2012."

If you truly wanted to protect public health, you would prioritize funding for expanded air monitoring. Start with replacing the air monitor system in Salinas as soon as possible! (And locate it nearer the fields!)

Then there is the lack of scientific knowledge about the effects of co mingling toxic pesticides with fumigants and fungicides, common practice amongst non-organic farmers. Both CDPR and Henry Gonzales (prior CAC) have admitted their ignorance regarding this science.

For all of these reasons, I have a hard time putting trust in your decision-making. Show me that I'm wrong. Begin with showing us that you truly listen to all this public input by reversing this bad decision. Then maybe we won't have to feel that you're selling out to the chemical companies at the expense of our health!

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