

**From:** [Jenine Davison](#)  
**To:** [CDPR dpr22005](#)  
**Subject:** Comment on rule for cancer-causing 1,3-dichloropropene (1,3-D)  
**Date:** Thursday, May 25, 2023 11:58:10 AM

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EXTERNAL:

[dpr22005@cdpr.ca.gov](mailto:dpr22005@cdpr.ca.gov)

To the Department of Pesticide Regulation:

You must rewrite the environmentally racist regulation of 1,3-dichloropropene you have put forward for public review.

As a School Counselor working in the Salinas Valley, I have seen the effects of harmful pesticides used in agriculture on Farmworkers and their children. The lives of these families and children are not worth 14 times less than those in non-ag communities.

I call on you to redesign your rule for cancer-causing 1,3-dichloropropene (1,3-D) to follow the official Prop 65 safe harbor level established by the California Office of Environmental Health Hazard Assessment (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.

Sincerely,

Jenine Davison