

From: [Paula Avila Kahn](#)
To: [CDPR dpr22005](#)
Subject: Public Comment re: 1,3-D
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EXTERNAL:

Hello my name is Paula Kahn, I'm policy director at Californians for Pesticide Reform and last year I graduated from the Johns Hopkins School of Public Health w/a specialization in humanitarian health, food systems and violence prevention. DPR's current regulation of 1,3-D presents a public health crisis. It is a moral imperative for DPR to end the separate and unequal exposure to 14 x the no significant risk level of the carcinogenic fumigant 1,3-D experienced among Latino, Indigenous and immigrant rural & farmworker communities. This is no way to treat the labor force that upholds the state's food system, which contributes to CA's economy as the fourth largest economy in the world. Not only is this environmental racism- this is environmental apartheid and it is a violation of Indigenous rights.

It is egregious for there to be no statewide, systematic monitoring and tracking of prevalence of diseases or the mortality rates in the populations on the frontlines of exposure at 0.56 ppb- the amount that is 14 x the NSRL, the amount that chemical monopoly Dow has advocated for. Upon learning directly from the oral testimonies shared by agricultural workers, which is what we call qualitative data in public health- that there is a correlation between exposure to 1,3-D and a disproportionate prevalence of cancer and higher mortality rates from cancer in farmworker communities. In public health- this is what we call disproportionate health outcomes from disproportionate exposures to toxic chemicals. It is this racialized, disproportionate exposure- facilitated by the labor exploitation of a particular social, racial and ethnic groups that constitutes environmental racism and environmental apartheid. We expect expeditious action to end this separate and unequal exposure to 1,3-D among rural, farmworker primarily Latino, Indigenous and immigrant populations. We want a NSRL of 0.004 for all Californians.

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