

From: jennkhan@aol.com
To: [CDPR dpr22005](#)
Subject: 1,3-dichloropropene
Date: Wednesday, May 31, 2023 6:13:45 AM

EXTERNAL:

Dear Department of Pesticide Regulation Director Henderson:

My name is Jennifer Khan and I am writing to you as a concerned citizen, homeowner, and retired public school teacher from Watsonville in Santa Cruz County. I am asking you to withdraw the environmentally racist policy your department has put forward for the cancer-causing fumigant pesticide 1,3-dichloropropene (1,3-D).

Your regulation would create a separate and unequal cancer risk standard for residents of farmworker communities who are predominantly Latino and Indigenous. The vast majority of my former students were Latinos from farmworker families. The school I worked at for 34 years is right across the street from berry fields. There were many weekends I didn't go to the school to work because pesticides were being applied. Yet even though I didn't go, I'm sure there were still children playing there, because every time I went to the school to work on the weekends, there were always children there playing on the playground. The ineffective notification we provided, surely did not deter them from scaling the fence and going to play. Neither they, nor their parents had any idea that their innocent play was exposing them to dangerous pesticides.

I am Latina, and my mother used to work in the fields. I know several people who have compromised lungs as a result of working in the fields. One of my friends died of pulmonary fibrosis caused by pesticides from working in the fields as a young man. He spent the last few years of his life on an oxygen tank 24/7. I also have another friend who currently has pulmonary fibrosis and has to spend the rest of her life on oxygen in order to survive. She worked in the fields for 50 years, and pesticides were the cause of her pulmonary fibrosis also. I realize that back when they were working, they didn't know the effects pesticides would have on their health in the future. But now we do know the effects, and we should do all that we can to protect people directly affected. I take it as a personal affront to see the flagrant disregard and danger your policy imposes on the very people who work so hard to provide us all with the produce our valley grows. I consider your policy to be environmental racism.

Banned or not approved in 34 countries, 1,3-D is the third most used pesticide in the Monterey Bay region, at more than one million pounds in 2021.

The impact of DPR's proposal, to create a separate and 14 times weaker standard of protection for Latino and Indigenous farmworker communities where most 1,3-D is applied, is racist. The three pesticide air monitors the State has employed in Monterey County at Ohlone Elementary School (2012-2021), the Salinas airport (2011-2016), and in Chualar (2017-2019) have all registered average air concentrations far above OEHHA's lifetime cancer risk warning level of 0.04 parts per billion. I am outraged that DPR's proposed regulation does not require action to reduce such harmful levels of 1,3-D.

DPR must create a 1,3-D regulation that will limit air concentrations to 0.04 parts per billion, the safe harbor level established for all Californians by OEHHA. As the late, great Maya Angelou said, “when you know better, do better”; we do know better and we need to do better.

Thank you for your consideration,

Jennifer Khan
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