

From: [Nancy Leon](#)
To: [CDPR dpr22005](#)
Subject: 1,3-dichloropropene
Date: Thursday, May 25, 2023 8:51:37 PM

EXTERNAL:

To the Department of Pesticide Regulation:

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

I was an educator for twenty years and worked in farmworker communities. I experienced working in schools that were close to agricultural fields in Monterey County CA, Santa Maria, CA and Santa Paula, CA.

The pesticides were sprayed on the fields close by and they drifted onto family homes and schools. Both parents and children experienced illnesses and reported them to doctors but nothing was done about it. I grew up in the Imperial Valley where crop dusters sprayed DDT right over our home. How is it that most of the world has banned this pesticide but the USA has not? Because corporations in this country have the power to control our government.

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, Nancy Leon