

From: [Sharon and Bruce](#)
To: [CDPR dpr22005](#)
Subject: Regulation of 1,3-D
Date: Wednesday, May 24, 2023 3:47:45 PM

EXTERNAL:

To the Department of Pesticide Regulation:

Please rewrite the dangerous regulation of 1,3-dichloropropene currently being proposed. My husband and I both lived and worked next to the fields in Salinas and wonder whether that had anything to do with the cancers we later developed.

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. It is obvious we should have more trust in an agency designed to safeguard our health than in an industry designed to generate profit.

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 disparity is disgusting.

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,

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