

**From:** [Bill Monning](#)  
**To:** [CDPR dpr22005](#)  
**Subject:** Senator Bill Monning (ret) Oppose DPR proposed Reg on 1,3, D  
**Date:** Tuesday, May 30, 2023 2:39:33 PM

---

EXTERNAL:

30 May 2023

To the Department of Pesticide Regulation:

I oppose the Department of Pesticide Regulation's proposed regulation of the cancer-causing fumigant 1,3-dichloropropene, which chooses Dow Chemical's preferred cancer risk level over the 14 times more health protective level set by the Office of Environmental Health Hazard Assessment (OEHHA).

Over the years, I have seen first hand, the gap between regulation and enforcement with respect to the application of highly toxic pesticides in California fields. In the early 1980s, I represented victims of mass crew poisonings in the Salinas Valley of farmworkers who were not protected by existing regulations. Too often the dangerous chemicals were banned only after human tragedies including mass poisonings and preventable deaths. Any economic benefits associated with the continued use of 1,3, D should not take priority over the human health risks proven to be associated with this chemical. At a minimum, the more protective standards recommended by the Office of Environmental Health Hazard Assessment should be prioritized.

Farmworker communities will suffer far more exposure than OEHHA considers safe if this regulation is implemented as is. Those most impacted are overwhelmingly Latino and Indigenous. This is environmental racism.

*OEHHA's cancer risk warning level for all Californians of 0.04 parts per billion must be the target level of any 1,3-D regulation.*

*Thank you.*

Sincerely,

/s/

Senator Bill Monning (ret)

**Senator Bill Monning, Ret.**  
**California State Senate**  
**Majority Leader Emeritus**  
**Attorney at Law**  
**he/him/his**

**P.O. Box 1385**  
**Monterey, Ca 93942-1385**