

From: [Laurie Palmer](#)
To: [CDPR dpr22005](#)
Subject: public comment on 1,3-dichloropropene
Date: Wednesday, May 31, 2023 10:50:31 AM
Attachments: [PastedGraphic-1.tiff](#)

EXTERNAL:

To the Department of Pesticide Regulation:

I am shocked and terrified by the potential that the DPR might establish the accepted level of (1,3-D) at 50 micrograms per day, as advocated by Dow Chemical, the manufacturer. This is a cancer-causing chemical and its limits should at most follow the Prop 65 Safe Harbor level established by the CA Office of Environmental Health Hazard Assessment (3.7 micrograms/day). You must rewrite this legislation.

As a teacher and an environmentally engaged citizen I have researched these chemicals in depth, and the effects they have on humans and on the environment.

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,

Laurie Palmer

A. Laurie Palmer
Professor, Art, and Environmental Art + Social Practice MFA
University of California, Santa Cruz
1156 High Street, Santa Cruz, CA 95064
apalmer1@ucsc.edu

