

From: [Oscar Ramos](#)
To: [CDPR_dpr22005](#)
Subject: Comments- 1,3-D
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EXTERNAL:

To Members of The Department of Pesticide Regulation,

The year following the release of her paradigm-shifting book, *Silent Spring*, Rachel Carson said to a US Senate Subcommittee in 1963:

I hope this [government] will give serious consideration to a much neglected problem—that of the right of the citizen to be secure in his own home against the intrusion of poisons applied by other persons ... I strongly feel that this is or should be one of the basic human rights. I am afraid, however, that it has little or no existence in practice.

As an elementary school teacher, I would add to that the right of *children to be secure in their schools* against the intrusion of poisons applied by other persons, too.

We know this is not the case, and hasn't been in the 60 years since Carson's warning to the world that pesticides don't just harm the targeted pests. They've been devastating to farmworker communities and our natural environment.

Today, we draw attention to a pesticide that is such a threat to public health and the environment that 34 countries have banned it. But not ours. It's called 1,3-dichloropropene or 1,3-D for short. Its brand name is Telone. It's a fumigant that can drift for many miles at harmful concentrations. It's a Prop 65 cancer-causing substance and Toxic Air Contaminant. This time of year, if you see those big grey tarps in the fields, they've likely been applied with 1,3-D mostly for berries in the Pajaro Valley and grapes in the Salinas Valley. In the Monterey Bay region, 1,3-D is applied almost exclusively in areas that are majority Latinx.

And, the State's own science tells us that our elementary schools have been exposed to cancer-causing levels of 1,3-D for at least a decade. The State's leading toxicologists tell us that a significant lifetime cancer risk comes from average daily exposure to 1,3-D air concentrations of 0.04 parts per billion. The State has tested the air at Ohlone Elementary

School every year since 2012. Every year the 1,3-D air levels have been *above* 0.04 parts per billion. Every single year *at an elementary school*. Over the 10-year testing period, the average 1,3-D air concentration has been 2.5 times above what our State toxicologists say is safe. *At an elementary school*. The average levels were similar during state air monitoring at the Salinas Airport near Bardin Elementary between 2011 and 2016, as well.

But the State and our County Ag Commissioner have done nothing to address the findings of the State's own science: that 1,3-D air concentrations have exceeded cancer-causing levels at elementary schools in Monterey County.

Why haven't our pesticide regulators acted to protect even our young children? It's outrageous, is it not? I think Carson was right when she wrote that it is an "*era dominated by industry, in which the right to make a dollar at whatever cost is seldom challenged.*" Company profits are apparently more important to our county and state governments than the health of children in farmworking communities--Latinx children. We always hear that California has the "strictest pesticide regulations in the country," but the problem is that the US is far behind other countries in protecting its farmworker communities. If 34 countries have figured out how to grow berries and grapes without cancer-causing 1,3-D, we can certainly do it here, too. Why we don't is a crime. Our county and state governments are clearly too cowardly to challenge the profit-makers. It's time for us to demand it.

We call on the Department of Pesticide Regulation to rewrite it's 1,3-D regulation to keep average 1,3-D levels below 0.04 parts per billion—the cancer risk warning level for *all* Californians. Anything less stringent is environmental racism.

Thank you for your valuable time,

Oscar Ramos
Concerned Father, Teacher, and Community Leader
Salinas Valley