

**From:** [Mike Stanghellini](#)  
**To:** [CDPR dpr22005](#)  
**Subject:** Comments on DPR's Revised 1,3-D proposal  
**Date:** Wednesday, May 31, 2023 2:56:12 PM

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EXTERNAL:

Dear Ms. Otani,

Re: Revisions to the REVISIONS TO HEALTH RISK MITIGATION AND VOLATILE ORGANIC COMPOUND EMISSION REDUCTION FOR 1,3-DICHLOROPROPENE DPR REGULATION NO. 22-005

TriCal, Inc. has served California growers by providing state-of-the-art soil fumigation services for more than 60 years. We have either developed ourselves or been integral in all soil fumigation advancements including TIF validation and deployment practices, GPS-guided shank application technology, perennial crop deep injection cultural practices, and more. In addition to technological advancements, we provide decades' worth of technical expertise to our growers by way of site-specific fumigation recommendations, field preparation guidance, and other stewardship practices.

Telone II and the various 1,3-D/Chloropicrin blends available in California are essential tools worldwide for the management of plant-parasitic nematodes and soil borne diseases. Collectively, these soil-borne pests compromise, and sometimes outright destroy, the root systems of many food and fiber crops. Injured roots lead to inefficient water and nutrient uptake by the crop, which ultimately leads to lower yields and, when widespread, higher prices for the end consumer (California residents).

TriCal appreciates the opportunity to comment on DPR's **Addendum: Modeling for mitigation measures to reduce acute exposure from 1,3-Dichloropropene, Revised setback tables**.

In the prior public comment period of this pending regulation, TriCal and others from our industry suggested that DPR consider regional modeling as a means to advance and elevate the scientific robustness of the pending regulations. In the newest proposal, DPR has done additional modeling, but only for two regions (coastal and inland), which is proposed to replace the original one-size-fits-all approach taken by DPR. TriCal requests that DPR consider additional refinements based on regions that are more discreet and accurate than "coastal" and "inland", particularly considering that in both current cases, DPR selected the worst-case meteorological conditions to determine the setback distances. As proposed, a majority of potential 1,3-D users will be penalized with larger setbacks than needed and which are driven

by meteorological conditions that may be several hundred miles away from their fields. As a primary custom application company in California who walks in-step with growers on the planning and executing of their soil fumigation needs, we have no problem with complex regulations (e.g., many “regions” with more refined setback distances) if they afford greater flexibility to growers and the multitude of site-specific soil and weather conditions that exist.

Thank you for considering TriCal’s input and commercial perspective. We invite DPR to contact us if there are any questions on our comments.

Best Regards,  
Mike Stanghellini, Ph.D  
Director of Research & Regulatory Affairs  
TriCal, Inc.