



January 28, 2016

Brian Leahy, Director  
California Department of Pesticide Regulation  
1001 I Street, Sacramento, CA 95814  
*Via email*

Dear Director Leahy:

The undersigned fifty (50) organizations join the statewide coalition Californians for Pesticide Reform in urging you to put the health of Californians first when you take action on the soil fumigant 1,3-dichloropropene, often marketed as Telone. As you know, 1,3-dichloropropene is a cancer-causing pesticide that is used in enormous quantities in California (almost 13 million pounds in 2013). Highest use has been in areas of the Central Valley and Central Coast where many low-income farmworkers live. In addition, the California Department of Public Health has highlighted its frequent use near schools around the state.

Your department recently finalized a risk characterization document for 1,3-dichloropropene that sets out a variety of different options for estimating the risks of using this pesticide. We urge you to follow the peer review recommendations from CalEPA's Office of Environmental Health Hazard Assessment and use the most health-protective options when you develop risk management guidelines for establishing new use restrictions for 1,3-dichloropropene. These health-protective options include the following:

- 1) Base your actions on estimated excess cancer risks of one-in-a-million, as is done for most pesticides and other toxic chemicals.
- 2) Base your actions on the assumption that some Californians live their entire life (70-year average) in areas where this pesticide is used.
- 3) Base your actions on the most health-protective method of extrapolating from cancer tests done on laboratory animals to human risks. (In the risk characterization document this is referred to as the "systemic" approach.)
- 4) Base your actions on the most health-protective exposure model. (In the risk characterization document this is referred to as the HEE5CB model.)

Thank you for making California a safer place for our children, farmers, farmworkers, and rural residents.

Sincerely,

A handwritten signature in black ink that reads "Sarah C. Aird". The signature is written in a cursive, flowing style.

Sarah C. Aird  
Acting Executive Director  
Californians for Pesticide Reform

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Additional signatories:

Azul, Marce Gutiérrez-Graudiņš, Founder/Executive Director  
Breast Cancer Action, Karuna Jaggar, Executive Director  
California Communities Against Toxics, Jane Williams, Executive Director  
California Rural Legal Assistance Foundation, Anne Katten, Pesticide and Work Safety Specialist  
CALPIRG, Jason Pfeifle, Public Health Advocate  
Carmel Valley Women's Network, Darby Moss Worth, Chair  
Center for Biological Diversity, Jonathan Evans, Environmental Health Legal Director and Senior Attorney  
Center for Environmental Health, Caroline Cox, Research Director  
Center on Race, Poverty and the Environment, Caroline Farrell, Executive Director  
Central California Asthma Collaborative, Kevin D. Hamilton RRT, RCP, Executive Director  
Central California Environmental Justice Network, Cesar Campos, Coordinator  
Central Valley Air Quality Coalition, Dolores Weller, Director  
Clean Water Action, Andria Ventura, Toxics Program Manager  
Clean Water and Air Matter (CWAM), Renee Donato Nelson, President  
Coalition for Clean Air, Bill Magavern, Policy Director  
Communities for Sustainable Monterey County, Member of the Monterey Bay Safe Strawberry Working Group, Luana Conley, Director  
Community Water Center, Jenny Rempel, Sustainable Agriculture Program Coordinator  
El Quinto Sol de America, Isabel Arrollo, Executive Director  
Environmental Working Group, Bill Allayaud, California Director of Government Affairs  
EPIC - Environmental Protection Information Center, Natalynne DeLap, Executive Director  
Food and Water Watch, Adam Scow, California Director  
Grayson Neighborhood Council, John Mataka, President  
Green Party of Monterey County, Larry Parrish, County Council Representative  
Klamath Forest Alliance, Kimberly Baker, Executive Director  
Label GMOs, Pamm Larry, Director  
Medical Advocates for Healthy Air, Kevin D. Hamilton RRT, RCP, Executive Director  
MOMS Advocating Sustainability, Rika Gopinath, Co-Chair  
Monterey Bay Central Labor Council, Robert Chacanaca, President  
Neighbors to Preserve Rural Sonoma County, Padi Selwyn, Co-Chair  
Northeast Organic Farming Association Interstate Council, Elizabeth Henderson, Organic Farmer and Co-Chair  
Occidental Arts and Ecology Center, Dave Henson, Executive Director  
Ojai Wildlife League, Sue Williamson, Coordinator  
Pajaro Valley Federation of Teachers AFT 1936, Francisco Rodriguez, President  
Parents for a Safer Environment, Susan JunFish, MPH, Executive Director  
Pesticide Action Network North America, Paul Towers, Organizing and Media Director  
Pesticide Free Marin by 2016, Barbara Bogard, Co-chair  
Pesticide Free Zone, Ginger Souders-Mason, Director  
Physicians for Social Responsibility - Los Angeles, Martha Dina-Argüello, Executive Director  
Planting Justice, Gavin Raders, Executive Director

Progressive Democrats of America--Monterey Area Chapter, Gary Karnes, President  
Proteus, Inc., Mike McCann, CEO  
Safe Strawberry Monterey Bay Working Group, Carole Erickson, Co-Chair  
Swanton Berry Farm, Jim Cochran, President  
Teamsters Local 890, Cesar Lara, Secretary-Treasurer  
Transition to Organics, Patty Pagaling, Executive Director  
Tri-County Watchdogs, Katherine King, Secretary  
Turning Green, Judi Shils, Executive Director  
Unitarian Universalist Social Justice/Faith in Action - Monterey Peninsula, Mibs McCarthy, Chair  
Watertrough Children's Alliance, Christine Dzilvelis, Board Member  
Wine and Water Watch, Shepherd Bliss, Steering Committee Member

cc:

*Matt Rodriguez, California Environmental Protection Agency*  
*Martha Guzman-Aceves, Office of Governor Jerry Brown*  
*Cliff Rechtschaffen, Office of Governor Jerry Brown*  
*Gina Soloman, California Environmental Protection Agency*  
*Arsenio Mataka, California Environmental Protection Agency*  
*Marylou Verder-Carlos, California Department of Pesticide Regulation*