



February 23, 2024

JT Teerlink, Assistant Director of Registration, Evaluation, and Human Health
California Department of Pesticide Regulation
1001 I St.
Sacramento, CA 95812-4015

RE: Follow-up on urgent need to end use of DCPA/Dacthal (via email)

Dear Assistant Director Teerlink:

We appreciate your prompt response to our recent letter. We are troubled to hear that the Department is still unwilling to initiate action to suspend use of DCPA (Dacthal) or at least put in place additional mitigations to protect agricultural worker and residents near applications, given the serious developmental effects in fetuses of pregnant rats at very low levels of exposure to DCPA, and the additional federal legal constraints that prevent USEPA from acting as quickly as California can.

We recognize that finalizing a risk assessment and acting to suspend Dacthal or put in place interim mitigations will take some resources but this should be prioritized given the severe risk to pregnant farmworkers. Additionally, the department already has the draft risk assessment issued in May by USEPA to build on. At a meeting with the EPA Office of Pesticide Programs (OPP) yesterday (February 22nd), OPP Director Ed Messina told Anne Katten that OPP has been in regular contact with DPR about this and would be happy to assist with preparing a risk assessment.

California has a proud history of acting ahead of USEPA to increase mitigations and suspend registration of pesticides when evidence of adverse effects on people or the environment comes to light. California DPR needs to step up now given the label directions that continue to allow reentry a mere 12 hours after application, and require no buffer and very inadequate handler protections.

Major uses of this herbicide are in broccoli and cauliflower, which are both labor-intensive crops, grown often near residential areas in Monterey and other central coast counties. In California, DCPA has been found in silicone wristband monitoring of teens in the Salinas-based

CHAMACOS project, and trace levels have repeatedly been found in air monitoring in Salinas, Santa Maria and Oxnard at monitoring stations that are some distance from vegetable fields.

We urge the Department to reconsider and act quickly to take action to end use of Dacthal in California or at least put in place strict mitigations.

Sincerely,



Anne Katten, MPH

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