

**COMMUNITY OUTREACH AND EDUCATION PROGRAM
SOUTHERN CALIFORNIA ENVIRONMENTAL HEALTH
SCIENCES CENTER
KECK SCHOOL OF MEDICINE, USC**

WEST OAKLAND ENVIRONMENTAL INDICATORS PROJECT

ENVIRONMENTAL HEALTH COALITION

COALITION FOR A SAFE ENVIRONMENT

Via U.S. Mail and E-Mail

February 28, 2006

Alan C. Lloyd, Ph.D., Secretary California Environmental Protection Agency (CalEPA) 1001 "I" Street Sacramento, CA 95814	Sunne Wright McPeak, Secretary California Business, Transportation & Housing Agency (BTH) 980 9th Street, Suite 2450 Sacramento, CA 95814
Robert Sawyer, Ph.D. Acting Chair California Air Resources Board (CARB or ARB) 1000 "I" Street Sacramento, CA 95814	Catherine Witherspoon Executive Director California Air Resources Board (CARB or ARB) 1001 "I" Street Sacramento, CA 95814
Mary-Ann Warmerdam, Director, Department of Pesticide Regulation 1001 I Street, P.O. Box 4015 Sacramento, CA 95812-4015	A.G. Kawamura, Secretary, California Department of Food and Agriculture 1220 N Street Sacramento, California 95814-5607

Re: Need for the State of California (as Part of the State's Goods Movement Action Plan process) to Evaluate Community Health and Safety Impacts from the Use of Fumigants on Imported or Exported Cargo Containers

Dear Secretaries McPeak, Lloyd and Kawamura, DPR Director Warmerdam, ARB Chair Sawyer and ARB Executive Director Witherspoon:

On behalf of the undersigned organizations and individuals who are members of the state's Goods Movement Action Plan's Integrating Work Group, we provide comments on the need for the State of California to evaluate community health and safety impacts from the fumigation of exported and imported cargo containers.

Fumigation of produce and products (for example, wood) for export or import in cargo containers is occurring all over the state of California. Several of us have tried to obtain information about fumigation facilities in local communities, with limited success, although we know that some fumigation facilities are located off-port in local communities.

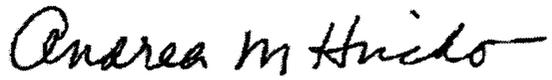
Fumigation of containers was identified as a problem in San Diego a number of years ago, with methyl bromide being used at a fumigation facility in a low-income, minority community. The Port of San Diego no longer fumigates containers at that location, as a result of a campaign by the Environmental Health Coalition to protect residents. It is possible, however, that those products are now sent to other ports in the state, with fumigation occurring elsewhere.

We have a series of recommendations and requests:

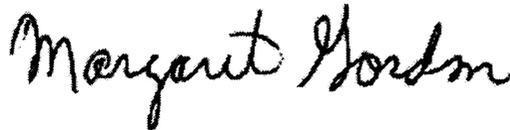
1. We request that the Department of Pesticide Regulation be asked to evaluate the potential community health impacts from fumigation of imported or exported cargo containers, including evaluating risks to residents, school children or others living, working or learning in close proximity to fumigation facilities.
2. We request that notification procedures be considered and developed to alert those in homes, schools, workplaces or other sensitive land uses in close proximity to these facilities, with advance notification before fumigation occurs. Some of the pesticides in use may already be on the Prop 65 list, warranting notification action by the fumigation or shipping companies, which we do not believe has been occurring.
3. We request that electronic maps be posted to the relevant Web sites for the Goods Movement Action Plan (and for DPR), showing the locations of fumigation facilities for imported and exported cargo containers, with their addresses. The list of facilities and the maps should identify which fumigants are being used at which facilities.

We appreciate your consideration of our recommendations and would appreciate this letter being posted to the Goods Movement Action Plan comments on the ARB/CalEPA/BTH Web sites.

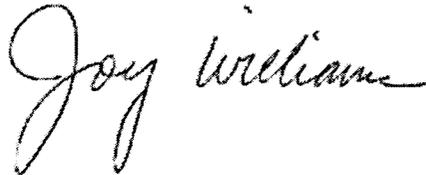
Sincerely,



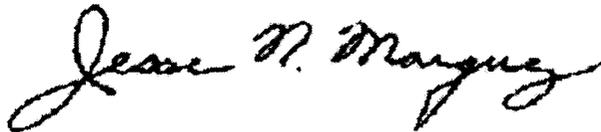
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