

April 16, 1990

Henry J. Voss, Director
California Department of Food and Agriculture
1220 N St.
Sacramento, CA 95814

Dear Mr. Voss:

I have learned through conversations with Farm Advisors and growers that the nematicide Telone has been banned from use in California based on air monitoring data provided to CDFR by the State of California Air Resources Board.

Telone is the most widely used nematicide in California and this action has thrown growers into a state of panic and confusion. I have received calls from Farm Advisors in Monterey, Santa Cruz, Modoc, Siskiyou, and Merced counties in which growers were in the process of fumigating for spring planted crops or planning to fumigate within the next few weeks. They indicate that our small growers have been particularly hard hit by this action. These growers have already purchased perishable planting materials for potatoes, sweet potatoes, and cole crops for planting in fields with known histories of nematodes. In all cases, the alternatives available which range from methyl bromide fumigation, to sprinkler applications of metam-sodium, to applications of organophosphates or carbamates (depending on the particular crop) are less desirable and potentially pose more harm to the environment than Telone.

The assumption that humans will be continuously exposed for 70 years to the concentrations detected is unrealistic and could cause unnecessary concern and even panic among citizens of California. Telone is used on about 2% of the states agricultural lands each year. A typical field would receive no more than one application of Telone in a years time and levels such as those found would likely exist in any particular area for no more than a few days each year. To put the actual danger to humans on a more realistic scale, I suggest you conduct a similar 70 year projection on gasoline and moth balls (paradichlorobenzene) which are also on the Proposition 65 list and for which the duration of human exposure is likely to be much greater than for Telone.

Growers will experience losses on potatoes, Brussel sprouts, broccoli, cauliflower, sweet potatoes, carrots, melons, squash, tomatoes and other annual crops within this growing season. This could well result in lower quality produce, higher costs to consumers, and/or shortages of these commodities in supermarkets this fall. A longer term consequence will be an increased expense for perennial nursery stock for fruit and nut crops which will need to be fumigated with methyl bromide rather than Telone and result in increased costs to consumers for these commodities as well.

I urge you to reconsider this action and allow continued use of Telone until more realistic assumptions on the exposure likely to be experienced by citizens of California can be made. I would be happy to work with you to develop some reasonable exposure projections for this and other nematicides based on usage patterns that actually exist for these materials.

Sincerely,

Becky Brown Westerdahl
Extension Nematologist