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MELLANO & COMPANY
YOUR DESTINATION FOR THE WORLD'S FINEST FRESH FLOWERS AND FOLIAGE

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May 8, 2025

California Department of Pesticide Regulation
1001 I Street
Sacramento, CA 95814

Dear JT Teerlink:

Our family has been farming cut flowers in southern California and celebrating our 100 year anniversary this year. We truly appreciate the commitment by DPR and the state to continue to evolve our agricultural practices to better, safer, and more effective methodologies as has been done for generations through the land grant colleges like the University of California. Technological advances are what allows us and the farmers in California to compete in the world economy, remain in business, and provide livelihoods to 100's of thousands, if not more, in the agricultural arena.

The implementation of SPM has been and continues to be a confusing process that lacks clarity and rationale relative to differentiation of previous commitments to IPM. It is, however, critically important regardless of the philosophy that scientifically determined prioritization of targeted improvements is accomplished in order to keep agriculture a viable industry in the state of California. Over the years the cost of production has continued to escalate and farm bankruptcies, especially in California, are accelerating at an exponential and very concerning rate. DPR's evolution to a more efficient agency developing solution faster is critical to getting ahead of this concerning trend.

Proposals to replace or eliminate existing crop protection tools without readily identifiable economic alternatives is very problematic to farmers. Historically solutions are either not cost effective or practical leading to lack of availability of agricultural products from domestic sources or further increases in pricing to consumers something we must vigilantly guard against. At several points in the presentation the implication is that solutions are available but farmers are not adopting them.....this is absolutely not true and DPR must not irresponsibly suggest to the public that they are! Given the shortage of economically viable solutions in many instances combined with consistent public challenges to those that have been developed, DPR should be prepared with the state to invest heavily in priority solutions.

Relative to the prioritization process, it is imperative that it be based on unbiased (non emotional) data and scientifically driven. It must also be vetted, not assumed, to be practical by actual practitioners for the commodities and areas targeted. To that end the committee must include not only scientists and academics but also actual practitioners from production agriculture.

Sincerely,

Michael A. Mellano, PhD
Mellano & Company