

Dr. Karen Morrison

Director

California Department of Pesticide Regulation

1001 I Street Sacramento, CA 95814

June 30, 2026

Re: Comments on SPM Advisory Committee Meeting - June 15, 2026

Dear Director Morrison and other members of the SPM Committee:

Thank you for the opportunity to comment on the topics discussed during the Sustainable Pest Management (SPM) Committee meeting held on June 15, 2026.

The Xerces Society for Invertebrate Conservation is a science-based nonprofit organization focused on the conservation of invertebrates and their habitats. We work closely with growers, researchers, agencies, municipalities, tribal partners, and conservation organizations across California to expand pollinator habitat, reduce pesticide risks to beneficial insects, and improve the health and resilience of agricultural, urban, and natural systems.

We are encouraged to see the California Department of Pesticide Regulation's continued commitment to advancing sustainable pest management practices and supporting their adoption across the state. We offer the following comments regarding the relationship between SPM and existing pest management frameworks, several examples of programs that may serve as useful case studies for SPM implementation across landscapes, and insights into our experiences with several of the incentive-based programs referenced in the meeting.

1. Clarify how Sustainable Pest Management (SPM) differs from Integrated Pest Management (IPM)

We appreciated the committee discussion regarding the relationship between SPM and Integrated Pest Management (IPM). Several committee members noted that the distinction between these concepts remains somewhat unclear under the current framing. We encourage DPR to more explicitly communicate how SPM differs from, builds upon, or operationalizes existing IPM principles.

This is particularly important given that IPM is not a single, universally consistent concept. There are likely over a hundred current definitions, and its interpretation can vary across programs and

contexts (Deguine et al. 2021), which can lead to inconsistency in how it is applied in practice. The SPM Roadmap appears to anchor its framing in the University of California Statewide Integrated Pest Management Program (UC IPM) definition, which describes IPM as an “ecosystem-based strategy that emphasizes long-term prevention through approaches such as biological control, habitat manipulation, modification of cultural practices, and resistant varieties, while using pesticides only when needed and in ways that minimize risks to human health, beneficial and non-target organisms, and the environment.”

We note that the UC IPM definition already reflects many principles commonly associated with SPM, including prevention, ecological approaches, and minimization of risks to human health, beneficial organisms, and the environment, and thus extends beyond many traditional formulations of IPM, which have often focused more narrowly on pest monitoring, economic thresholds, and judicious pesticide use. The clearest potential distinction appears to be that SPM places these practices within a broader sustainability framework and more explicitly involves reduction in reliance on high-risk pesticides. We encourage DPR to make this distinction clearer, including the extent to which pesticide reduction (or pesticide risk reduction) is intended to be a defining feature of SPM implementation.

2. Existing programs provide examples of SPM implementation

During the June 15 meeting, DPR staff expressed interest in identifying examples and case studies that demonstrate successful implementation of sustainable pest management principles. We would like to make the department and committee aware of several existing programs that align closely with SPM objectives and may serve as useful examples or implementation resources.

Xerces Habitat Kit Program

The Xerces Habitat Kit Program is a nationwide initiative that provides free, regionally appropriate, climate-resilient, sustainably grown native plants to support pollinators and other beneficial insects. In California, the program includes two complementary efforts: one focused on creating or enhancing habitat across working lands, public lands, tribal lands, post-wildfire recovery areas, and other community spaces in collaboration with landowners and land managers across the state (including farms, ranches, urban farms and gardens, city parks, school gardens, and other public spaces); and a Southern California Residential Pollinator Habitat Kit Program that provides free plants to residential properties, schoolyards, community gardens, and other urban spaces across Los Angeles, Orange, Ventura, Santa Barbara, San Bernardino, Riverside, San Diego, and Kern counties.

In addition to providing habitat resources, the program incorporates pesticide-related siting criteria designed to help ensure the establishment of high-quality, low-risk habitat for pollinators. In some cases, follow-up engagement with Xerces staff has supported landowners in adjusting pesticide use practices to improve habitat quality and reduce risks to pollinators. Since 2019, the program has distributed more than 250,000 native plants to partners across the state. This initiative demonstrates how habitat creation, pesticide risk reduction, technical assistance, and voluntary participation can be integrated into a practical conservation model.

Bee City USA and Bee Campus USA

We also encourage the committee to consider the Bee City USA and Bee Campus USA certification programs as examples of urban and institutional approaches that support SPM goals. California currently hosts eleven cities and eighteen college campuses that have all committed to conserving native pollinators by providing them with healthy habitat that is rich in a variety of native plants, provides nest sites, and is protected from pesticides. In addition to habitat creation and maintenance requirements, participating communities commit to developing and implementing integrated pest management (IPM) plans designed to prevent pest problems, reduce pesticide use, and expand adoption of non-chemical pest management approaches.

Many California affiliates have adopted actions to reduce pesticide use and risks, including implementing specific non-chemical pest prevention and management practices, avoiding use of pesticides on designated pollinator habitat or other sensitive sites, eliminating aesthetic and cosmetic use of pesticides, transitioning to using only organic pesticides, and using pesticides only as a last resort within their IPM plans. Communities are also investing in public outreach and training for their staff to increase adoption of SPM practices. These programs may provide useful urban sector examples of how SPM principles can be incorporated into municipal and institutional land management.

Bee Better Certified™

The final Xerces program we would like to mention is Bee Better Certified™, a third-party verified eco-label focused on pollinator and biodiversity conservation that provides a framework for farmers and food systems to implement practices that reduce pesticide risks and strengthen ecological resilience on working lands. Through habitat creation and stewardship, integrated pest management practices, and restrictions on high-risk pesticide use, the program offers a practical example of how sustainability goals can be translated into measurable on-farm actions. To date, the program has certified 28 farms across 40 crops, encompassing 29,000 crop acres and 1,000 acres of permanent pollinator habitat. This program may provide a useful example of

how SPM principles can be operationalized through measurable standards and third-party verification.

3. Incentive-based programs can support broader adoption of SPM practices

We also appreciated the discussion of existing incentive-based approaches to support adoption. In addition to the programs mentioned above, the Xerces Society has extensive experience implementing habitat and pesticide risk mitigation on working lands through a range of different programs, including USDA NRCS conservation programs, private sector supply chain initiatives, and the California Department of Food and Agriculture (CDFA) Pollinator Habitat and Healthy Soils Programs.

During the meeting, the CDFA Pollinator Habitat Program (PHP) block grant was referenced as one example of this type of investment. Please note that funding for the pilot phase of the PHP was fully allocated in 2022, and the program was not included in the 2026-27 budget and is not currently being offered. As the pilot program approaches conclusion, we encourage DPR to communicate the value of this and similar programs to CDFA and highlight the role well-structured state incentive programs can play in helping growers transition toward more sustainable pest management practices. We also want to emphasize how effective the PHP program was in facilitating grower adoption by addressing the two most common limiting factors in implementing on-farm habitat and biodiversity conservation: limited technical knowledge and high upfront costs of materials and labor. The PHP provided block grant awardees with the flexibility to tailor technical assistance to grower needs (including providing training on IPM), absorb much of the program's administrative burden, and cover upfront implementation costs on behalf of growers. While other incentive programs, including the CDFA Healthy Soils Program block grant, continue to support implementation of some SPM practices, they often place greater administrative and financial responsibility on growers while offering less funding for technical assistance, which may reduce accessibility and participation for some operations.

We also encourage continued consideration of USDA NRCS Conservation Practice Standard 595 (Pest Management Conservation Systems) as an existing mechanism that can support SPM implementation. Through programs such as the Environmental Quality Incentives Program (EQIP), NRCS 595 provides a framework for integrating both comprehensive and crop-specific pest management activities that can support grower adoption of lower-risk pest management systems. California NRCS already supports several crop- and pest-specific applications of 595 that align closely with SPM objectives, such as support for mating disruption for navel orangeworm in almonds. However, the current suite of crop-specific applications of 595 remains limited and adoption of 595 appears relatively low. There may be opportunities to increase adoption and effectiveness through development of additional crop-specific applications,

stronger implementation support, and increased outreach and technical assistance for both growers and NRCS conservation planners. Advancing development and broader adoption of these approaches will likely require coordination among multiple agencies and organizations, including California NRCS, UC IPM, and other partners.

Finally, we'd like to request that future public comment periods remain open for at least two weeks following the posting of meeting recordings rather than two weeks following the meeting date itself. This would improve accessibility and provide stakeholders a more meaningful opportunity to review discussions and provide thoughtful feedback.

We appreciate DPR's leadership and continued efforts to advance sustainable pest management in California and thank you for your consideration of these comments.

Sincerely,

Staci Cibotti, PhD

Pesticide Program Specialist

The Xerces Society for Invertebrate Conservation

Links and References:

Bee Better Certified: <https://beebettercertified.org/>

Bee City USA/Bee Campus USA: <https://beecityusa.org/>

Xerces Society Pollinator Habitat Kit Program

- California Monarch and Pollinator Habitat Kits:
<https://xerces.org/pollinator-conservation/habitat-kits/california>
- Southern California Residential Pollinator Habitat Kits:
<https://xerces.org/pollinator-conservation/habitat-kits/southern-california>

Deguine, Jean-Philippe, Jean-Noël Aubertot, Rica Joy Flor, Françoise Lescourret, Kris A. G. Wyckhuys, and Alain Ratnadass. 2021. "Integrated Pest Management: Good Intentions, Hard Realities. A Review." *Agronomy for Sustainable Development* 41 (38).
<https://doi.org/10.1007/s13593-021-00689-w>.