



June 30, 2026

Sapna E. Thottathil, Ph.D.

Deputy Director for Sustainable Pest Management

California Department of Pesticide Regulation

DPR Staff and Members of the Sustainable Pest Management Advisory Committee

California Department of Pesticide Regulation

Re: California Pest Management Association's Comments on the June 15, 2026 Sustainable Pest Management Advisory Committee Meeting

Submitted via Smart Comment

Dear Deputy Director Thottathil, DPR Staff, and Members of the Sustainable Pest Management Advisory Committee:

The California Pest Management Association (CAPMA) appreciates the opportunity to provide comments following the first meeting of the Sustainable Pest Management Advisory Committee. DPR's meeting materials state that the Committee will advise DPR on goals, tactics, policies, and partnerships supporting statewide implementation of Sustainable Pest Management, track statewide progress, and review public comments submitted during the 15-day comment period. DPR also made clear that the Committee does not hold decision-making authority.

CAPMA appreciates that DPR is exploring the concept of Sustainable Pest Management and how it may be applied across California. As DPR evaluates this concept, CAPMA urges the Department and the Committee to proceed carefully, practically, and with full consideration of the public health, property protection, housing, and economic realities of professional structural pest management.

CAPMA's primary recommendation is straightforward: **DPR should appoint a CAPMA member and structural pest management expert to the SPM Advisory Committee before the next meeting. CAPMA strongly recommends Blair Smith, BCE, or Dr. Sydney Crawley.**

1. The Committee needs structural pest management expertise and a CAPMA member.

DPR's own meeting materials recognize that pest management is necessary to protect public health. That is especially true in the structural pest management industry, where professionals protect homes, schools, childcare facilities, hospitals, senior care facilities, multifamily housing, restaurants, food processing facilities, grocery stores, hotels, warehouses, public buildings, and commercial properties.

Structural pest management is not interchangeable with agricultural pest management. It involves pests hidden inside walls, attics, crawlspaces, roofs, equipment voids, kitchens, drains, food-handling areas, hospitals, schools, apartment buildings, and other sensitive sites. It also involves real estate transactions, tenant habitability, public health complaints, food safety requirements, customer tolerance, reinspection requirements, regulatory compliance, and liability.

A theoretical alternative can look viable in a meeting room but fail in practice because the infestation cannot be located, the pest is inaccessible, the structure cannot tolerate the treatment, the customer cannot tolerate repeated failures, the site requires immediate correction, or the law requires a higher standard of certainty. The Committee needs someone who understands these realities before recommendations are formed.

2. CAPMA strongly recommends Blair Smith, BCE, or Dr. Sydney Crawley.

Blair Smith, BCE, would bring California-specific structural and urban pest management expertise that is directly relevant to the Committee's work. Her application states that she has more than eight years of experience in structural, urban, and institutional pest management programs throughout California, with a focus on developing, implementing, and auditing IPM programs that reduce pesticide risk while maintaining effective pest control outcomes. As Director of Technical and Quality Assurance for Clark Pest Control, she oversees statewide IPM standards, technician training, regulatory compliance, and quality assurance across residential, commercial, food-handling, healthcare, educational, and municipal settings.

Ms. Smith's CV also shows that she develops technical protocols for approximately 800 technicians, has trained more than 400 technicians for Branch 2 and Branch 3 licensing, performs WDO inspection quality assurance, develops service protocols and SOPs, and participates in UC Riverside Pest Management Alliance work involving field trials on low-impact service techniques. Her application further states that she works at the intersection of regulation, science, and field application, and can contribute expertise in pesticide regulatory compliance, urban and structural pest management, resistance management, stakeholder communication, and translating applied research into practical guidance.

Dr. Sydney Crawley would also bring exceptional expertise in urban and medical entomology. Her CV lists a Ph.D. in Entomology, current service as Principal Vector Scientist at Rentokil Terminix, prior service as Assistant Professor and Extension Specialist in Urban Entomology at North Carolina State University, and prior service as a Public Health Entomologist responsible for public health pest product portfolios, research, product development, technician training, and academic and industry partnerships. Her publications and professional work include bed bugs, ticks, mosquitoes, cockroaches, public health pests, traps, pest monitoring, structural pest inspection, and urban pest management training.

Either candidate would add practical, science-based structural pest management expertise that the Committee needs.

3. Professional pest control protects public health, housing, and property.

Structural pest control professionals manage pests that affect health, sanitation, habitability, and property value. Rodents, cockroaches, mosquitoes, flies, bed bugs, ants, termites, stored product pests, and wood-destroying organisms are not merely nuisances. The *Pest Prevention by Design* guidelines explain that pests compete with people for resources, can carry disease, create unsafe conditions, and may be associated with sanitation and building maintenance problems.

The same guidelines emphasize that effective structural pest prevention requires an understanding of local pest pressures, pest biology, building conditions, entry points, harborage, food, and water. They also note that pest tolerance varies by setting: an occasional ant trail in a home may be a nuisance, but even a single ant in a surgical ward can have serious consequences.

That is why access to effective pest management tools matters. If California policy limits necessary tools before equally effective and practical alternatives exist, the consequences will not be theoretical. Californians could face more pest pressure, more retreatments, more property damage, higher service costs, greater inequity, and increased public health risks.

4. Sulfuryl fluoride remains essential because there is no comparable whole-structure replacement.

DPR's own sulfuryl fluoride alternatives materials, based on the independent CCST review, state that many chemical and nonchemical localized treatments are effective and widely used in California, but that few viable alternatives exist for whole-structure fumigation. The same materials state that sulfuryl fluoride has been an effective structural fumigant for approximately 30 years and became the only federally approved fumigant for homes, garages, barns, storage units, and commercial warehouses after methyl bromide was phased out.

That distinction is critical. Localized treatments have a role, but localized treatment is not the same as whole-structure fumigation. Whole-structure fumigation is designed to address all wood in a structure at the same time. Localized treatment depends on locating the infestation. DPR's sulfuryl fluoride materials explain that localized treatments are highly reliant on the ability of pest management professionals to locate the exact site of infested boards and termite tunnel systems, and that existing detection devices cannot reliably identify the presence and location of drywood termites in structures.

The same materials explain that some situations remain legally and practically dependent on sulfuryl fluoride, particularly when termite infestations extend into areas inaccessible to professionals and structures are not amenable to whole-structure heat treatment. They further note that heat treatment, while a whole-structure alternative in some cases, costs approximately twice as much as fumigation, cannot be used on all structures, and can damage heat-sensitive materials such as vinyl, Formica cabinets, and newly installed wood flooring.

A list of possible alternatives should not be confused with a viable replacement for sulfuryl fluoride. The standard should be whether an alternative is effective, available, affordable, legally workable, and capable of protecting public health and property under real structural conditions.

5. The economic stakes are substantial.

A 2024 peer-reviewed article by Dr. David Zilberman and Dr. Vernard Lewis of UC Berkeley in the *Journal of Economic Entomology* modeled the economic effects of restricting sulfuryl fluoride for drywood termite control in California. They estimated that annual drywood termite damage and home equity loss in California would be **\$4.5 billion to \$16.8 billion without treatment.** They further estimated that current practice, using fumigation for a portion of homes and localized treatments for others, results in a combined social cost of roughly **\$1 billion to \$2 billion annually**, while a localized-treatment-only scenario would cost **\$3.2 billion to \$4.9 billion annually**. Their analysis estimated that severe restriction or banning of sulfuryl fluoride would increase annual social costs by **\$1.43 billion to \$4.31 billion.**

Zilberman and Lewis also explain that when localized treatment is ineffective and sulfuryl fluoride cannot be used, drywood termite colonies may be inaccessible or undetected, creating significant damage risk. They further note that drywood termites can attack structures in hidden and concealed locations, with multiple colonies attacking simultaneously, and that local treatments are highly dependent on finding active infestation sites.

California's housing affordability challenges make these risks even more serious. Policies that reduce access to effective termite control can translate into higher repair costs, reduced home equity, increased transaction costs, and disproportionate impacts on lower-income property owners and renters.

6. Greenhouse gas discussions should use full social-cost analysis.

Sulfuryl fluoride has been discussed in the context of greenhouse gases. That issue should be evaluated proportionately and in the full context of public health, housing, property protection, treatment efficacy, and economic cost.

Zilberman and Lewis estimate that each sulfuryl fluoride fumigation in California uses approximately 6 kilograms of sulfuryl fluoride on average, and they use an estimated global warming effect of 4,800 kilograms of CO₂-equivalent per kilogram of sulfuryl fluoride. Their analysis estimates total GHG costs for 100,000 fumigated structures annually and concludes that, even accounting for GHG costs, current practice produces large social gains compared with no treatment or localized-treatment-only scenarios.

For context, CARB's 2025 greenhouse gas inventory report states that California's 2023 statewide emissions were **360.4 MMTCO₂e** and that direct transportation-sector emissions accounted for **37.1%** of statewide emissions. CARB also notes that sulfuryl fluoride is tracked separately from the AB 32 inventory's seven greenhouse gases. Using Zilberman and Lewis's estimate of roughly **2.9 MMTCO₂e** for annual California sulfuryl fluoride structural fumigation emissions, that is approximately **three days of total statewide emissions or roughly eight days of direct transportation-sector emissions.**

That comparison does not eliminate climate concerns, but it does show why single-factor analysis is inappropriate. Zilberman and Lewis estimate that the implied cost of eliminating sulfuryl fluoride emissions through severe restriction or a ban would be **\$624 to \$1,465 per ton of CO₂ eliminated**, while also increasing social costs by billions of dollars and creating equity and property impacts.

7. Prevention and IPM are important, but they do not replace necessary remedial tools.

CAPMA members already use inspection, monitoring, exclusion, sanitation, habitat modification, mechanical controls, customer education, targeted applications, and other IPM practices. These tools are essential. They can prevent infestations, reduce pest pressure, improve sanitation, and help ensure that pesticides are used appropriately.

But prevention cannot fully replace remedial treatment when an active infestation already exists. California has millions of existing structures, many of them older, wood-framed, and vulnerable to termites and other structural pests. Building design, exclusion, and maintenance can help reduce future pest pressure, but they cannot substitute for effective professional tools needed to control existing infestations in real buildings.

The *Pest Prevention by Design* guidelines themselves recognize the importance of building design and retrofit, but also note that many pest control activities are “predominantly in the realm of pest control professionals,” not builders. **That is exactly why DPR needs structural pest management expertise and a CAPMA member on the Committee.**

8. CAPMA’s recommendations.

CAPMA respectfully recommends that DPR:

1. **Appoint a structural pest management expert and CAPMA member to the SPM Advisory Committee before the next meeting**, specifically Blair Smith, BCE, or Dr. Sydney Crawley.
2. **Preserve access to essential structural pest management tools**, including sulfuryl fluoride, unless and until alternatives are proven to provide comparable efficacy, affordability, availability, legal workability, and protection of public health and property.
3. **Evaluate alternatives using real-world criteria**, including whether they work in inaccessible infestations, whether they increase retreatments, whether they are affordable, whether they are legally defensible, whether they protect sensitive sites, and whether they can be implemented by licensed professionals in actual structures.
4. **Consider the full social cost of any restriction**, including public health risk, housing impacts, termite damage, home equity loss, repair costs, retreatment, consumer costs, and disproportionate impacts on renters and lower-income Californians.
5. **Engage CAPMA, the Structural Pest Control Board, County Agricultural Commissioners, UC researchers, and licensed structural pest management professionals** before forming recommendations that could affect structural pest management tools or practices.

Conclusion

CAPMA appreciates that DPR is exploring the SPM concept and seeking stakeholder input. As this process moves forward, the Committee must include the practical expertise needed to understand the built environment. Structural pest management protects public health, housing, food safety, schools, hospitals, businesses, and property.

DPR should not move forward without a structural pest management expert on the Committee. CAPMA strongly urges DPR to appoint Blair Smith, BCE, or Dr. Sydney Crawley so future discussions are informed by practical, science-based, field-tested expertise.

Respectfully submitted,

Jake Plevelich
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