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June 29, 2026

Submitted Via Public Comment Portal Only

Dr. Karen Morrison, Director
California Department of Pesticide Regulation
1001 I St., P.O. Box 4015
Sacramento, CA 95812-4015

RE: Inaugural Meeting of DPR Sustainable Pest Management Advisory Committee

Dear Director Morrison:

The California Association of Pest Control Advisers (CAPCA) submits these comments in response to questions posed and discussed at the Department of Pesticide Regulation's (DPR) inaugural Sustainable Pest Management (SPM) Advisory Committee meeting held on June 15, 2026. CAPCA represents approximately 75% of California's 4,000 licensed Pest Control Advisers (PCAs), with 15 active chapters spanning every crop and commodity grown in this state. We have long been engaged in the discussion and implementation of sustainable pest management, as it reflects the daily activities and practices of our members.

We appreciate DPR's commitment to initiating an advisory process around SPM implementation and welcome the opportunity to provide input. Our comments address the SPM resource development framework as well as the incentives and support programs landscape. We highlight CAPCA's existing programs and networks as critical resources DPR can and should engage, and we welcome a collaborative approach to ensure SPM adoption is grounded in the realities our members experience in the field.

SPM Communication, Messaging and the Resource Development Framework

It is important to note that the SPM Roadmap, as detailed in DPR's matrix framework, describes work that our members are already doing. The individual-level actions outlined in the matrix, including practicing Integrated Pest Management (IPM), refining practices, referencing the science, providing trainings, habitat conservation, supporting research and field trials, applying for grants, and more, are all part of the professional standard of care that Pest Control Advisors actively practice daily. We raise this in support of DPR's goals, and to request thoughtfulness around this critical messaging objective. If SPM outreach is framed as introducing new practices rather than building upon and amplifying existing activities, it will generate confusion and frustration among various stakeholder groups. The

continued ambiguity between SPM and IPM, a point raised repeatedly during the meeting, is a symptom of this framing challenge. We encourage DPR to ground all SPM messaging in a clear narrative that acknowledges the activities PCAs engage in daily, while casting a vision to describe what IPM can grow into when coordinated at scale and across landscapes and communities.

PCAs and growers must be a priority audience for SPM outreach, but DPR should not assume that it can reach this audience through its own channels alone. Instead, given this is not a regulatorily driven process, we urge DPR to prioritize non-regulatory channels for getting the information out. DPR should focus on working through the organizations they are members of and trust, such as their commodity groups, farm advisors, and associations like CAPCA. We can and should be valuable partners in that effort.

SPM is explicitly framed as a community-based approach. DPR should consider the potential for audience reach of the organizations that they are funding through SPM grants. We encourage DPR to think about how they can integrate with organizations such as CAPCA to get the outcomes of those efforts, key lessons learned, and implementation recommendations, out to the broader community that can make a substantial impact on meeting SPM goals, including PCAs and growers.

CAPCA is a trusted and effective messenger, through the peer-to-peer content provided through *The Adviser* magazine, regular chapter meetings held across the state, Continuing Education (CE) programming, and direct member communications. Our members trust us because we represent their professional interests and are engaged in constant attention to ensuring they have the best possible data, science and resources to do their jobs well.

We encourage DPR to evaluate its outreach investments through the lens of how established the audiences are, and how effective an impact might be made by the organizations getting the information to critical practitioners that drive SPM growth.

Continuing Education: Restoring the Value of Peer Learning

DPR has taken welcome steps toward incorporating SPM into CE requirements. However, the removal of interactive CE formats, including panel discussions that bring together researchers, PCAs and growers to discuss real-world implementation of innovations, has meaningfully reduced the quality and effectiveness of these sessions for our members.

For PCAs to lead SPM adoption in our communities, they need opportunities to learn from one another, not just formal technical presentations. A panel that features a researcher, a PCA and a grower discussing the practical realities of implementing a new practice is among the most effective learning formats available. These bridge the gap between research and adoption in ways that static webinars cannot.

CAPCA urges DPR to reconsider the restrictions currently placed on interactive CE formats and to actively support their use for SPM education, including by crediting them appropriately. We welcome the opportunity to collaborate with DPR on developing CE courses that address SPM in a practical, field-relevant way, that reaches PCAs through channels they already use and trust.

A Case Study in Missed Collaboration: Rodent Management

We want to highlight a gap between DPR's current approach and a true opportunity for collaboration, using a concrete example that is directly relevant to DPR's recent grant awards and SPM.

Since the fall of 2024, CAPCA has been deeply engaged in addressing the rat infestation crisis affecting almond, pistachio and other orchard operations across the Central Valley. Our efforts have included:

- Coordinating with CDFA, UC Cooperative Extension, county agricultural commissioners, and commodity groups to compile and disseminate resources
- Developing and distributing a PCA-designed Rat Infestation Management Checklist
- Building and piloting the Rat Monitor tool as a baseline monitoring framework
- Conducting a RAT survey to gather field-level data on infestation scope and impact
- Collaborating with CDFA on a video training series on roof rat management
- Supporting CDFA OPCA in generating an economic impact memo that informed state-level response
- Facilitating distribution of free bait stations to PCAs and growers in affected counties

DPR's presentation in this meeting spotlighted the recent SPM grant cycle which awarded over \$1.8 million for rodent management alternatives, including projects focused on protecting irrigation infrastructure, an area where CAPCA has directly engaged for over a year. At no point did DPR reach out to CAPCA to ask how these investments might build on the networks and resources we have already developed.

This is not a criticism of the grant recipients. Instead, it is an observation about process. DPR developed and funded parallel efforts without engaging the organization that has built trusted infrastructure, established relationships in the research and state agency communities, and is actively reaching the practitioners that implement these programs. The result is a missed opportunity that leads to duplication of effort, slower adoption and outreach that does not benefit from the credibility and trust CAPCA has already established with PCAs and growers on this critical issue.

We raise this rodent management example because it is indicative of a broader pattern, and because we believe this gap can be filled through collaboration. Before launching future pilots, outreach programs or funding initiatives in areas where CAPCA is already active, we encourage DPR to reach out early to build genuine collaboration that leverages existing relationships and resources to maximize impact.

Pesticide Use Reporting and Accurately Contextualizing the Data

During the June 15 meeting, comments from some members focused on Pesticide Use Report (PUR) data transparency. We want to offer important context for how the committee considers this discussion as it evolves.

The PUR captures what pesticides are applied. It does not, and cannot, capture the extensive monitoring, scouting, threshold-based decisions, and interventions that PCAs and growers engage in before any application occurs. The absence of a pesticide application in the PUR record does not mean that no pest management occurred, in most cases, it means IPM worked as intended. Treating PUR data as a complete picture of pest management implementation and practice fundamentally misunderstands how professional pest management is conducted in California.

UC Davis recently published a DPR-funded study: *Conflicts of Interest, Risk Aversion, and Pesticide Use in California Agriculture*, on PCA decision-making¹. This study is an important counter-narrative to some of the assumptions brought up by these committee members. DPR and the SPM committee should actively review that research and its findings to provide a stronger understanding of PCA decision making methodologies in practice.

We are also looking forward to the release of the forthcoming report by CDFA OPCA on *Evaluating SPM adoption by Pest Control Advisers (PCAs)* which in collaboration with CAPCA tracks the non-chemical PCA observations that are critical to understanding the broad activity of IPM that already exists in the field. We believe understanding the full picture of integrated decision making to mitigate pest and disease, not just PUR data is a critical component as this committee looks to build meaningful next steps to enhance IPM into SPM. This study should serve to furthermore validate the DPR-funded, UC Davis published study by Dr. Jay Rosenheim noted above.

Conclusion

CAPCA appreciates the opportunity to share our interest in collaboration and vision for growing awareness and meeting SPM objectives through California. We believe that SPM success depends on the recognition of the existing IPM processes and dynamic nature of

¹ Rosenheim, J. A., & Culshaw-Maurer, M. (2026). Conflicts of interest, risk aversion, and pesticide use in California agriculture. *Journal of Pest Science*, 99(1), Article 19. <https://doi.org/10.1007/s10340-025-01999-8>

tools that are fundamental to SPM. We believe that SPM success depends on building connections with the practitioners that will implement it, through the organizations they trust. We welcome the opportunity to discuss any of these recommendations further.

Sincerely,

Ruthann Anderson | **President/CEO**

