Sacramento Area Sewer District (Hope Taylor)

What types of SPM projects should DPR fund? Some ideas for projects to focus on:

- Active ingredients or products on DPR's Continuous Evaluation and Monitoring table
- Emerging pest threats
- Pest prevention
- Pest management coordination between different landscapes, neighbors, and communities

Note: All projects should have an SPM focus.
Urban pesticide goals, focus areas, and mitigations warrant high priority for SPM funding. Roughly 80% of pesticide use in California is non-agricultural, or what is referred to as urban pesticide use. Not only is pesticide use high in urban areas, the risk to human health and the environment is also high. For example, many pet flea pesticides are acutely harmful to humans and also are found at levels in urban aquatic environments above aquatic life benchmarks. Meanwhile, the majority of DPR resources to date have focused on agricultural uses.

We request that SPM funding be weighted proportionally considering usage and risk towards urban pesticide concerns. We strongly recommend that the SPM Committee develop separate urban and agricultural subgroups as they have vastly different priorities and research needs. Pesticides that are applied on pets are of particular concern because of human health risk and down-the-drain impacts to the environment. Most urban pesticides are applied by consumers, not by licensed pesticide professionals, so the urban SPM funding focus should be on consumer use of pesticides.

What are priority topics, communities, regions, etc., to fund?
SPM funding that reduces urban pesticide impacts is needed to protect urban communities and the environment.

Urban communities are impacted by pesticides, both in terms of human health impacts and environmental impacts. We suggest that the SPM Committee select pet flea control as a pilot priority for urban SPM implementation. Pet flea control is an excellent example of a pest control challenge that would greatly benefit from development of an "Action Plan" as outlined in DPR's SPM Roadmap (published in January 2023).

Currently much of DPR's effort has been focused on a single pet pesticide active ingredient: Fipronil. Pet-owners and people who work with pets need DPR to comprehensively study pet flea products and potential alternatives to prevent consumers from turning to regrettable substitutions that are harmful to humans and the environment.

Monitoring projects conducted by DPR's Surface Water Protection Program have concluded that at least three classes of pet flea control active ingredients with high aquatic toxicity (fipronil, neonicotinoids, and pyrethroids). These classes of pet pesticides have a down the drain route to wastewater treatment plants, pass through treatment, and appear in effluent at concentrations above aquatic toxicity thresholds.

These pesticides also pose threats to wastewater agencies in addition to the environmental risks. They threaten National Pollutant Discharge Elimination System (NPDES) permit compliance, Total Maximum Daily Load (TMDL) compliance, and the feasibility of potable reuse using wastewater effluent, in addition to exposing wastewater treatment plants to the potential for third party lawsuits under the Clean Water Act (CWA). Costs incurred by wastewater treatment plants can get passed to the public through increased rates.

Additionally, many of these pet flea control products are acutely and chronically harmful to workers and people with pets. Some of these products are known carcinogens, such as tetrachlorvinphos-treated flea collars.

Should DPR fund fewer large-scale projects or several small-scale projects?
Project funding should be prioritized based on many factors such as environmental impacts, human health impacts, etc. The DPR SPARC committee is undergoing a prioritization process that should be linked to how SPM project funding is prioritized.

Should DPR fund long-term or short-term projects?
Again, project funding should be prioritized based on many factors such as environmental impacts, human health impacts, etc. The DPR SPARC committee is undergoing a prioritization process that should be linked to how SPM project funding is prioritized. The length of projects will depend on what the project is accomplishing.

What factors should DPR consider and evaluate when they review project proposals?
Since roughly 80% of pesticide use statewide is in urban areas, we suggest that a proportionate amount of SPM funding be used to address urban pesticide issues. Not only is pesticide use high in urban areas, the risk to humans and the environment is also high.

For example, pet flea control products have a direct down-the-drain pathway through pet shampoos, washing pets, washing pet bedding, and washing hands after touching pets. Many of these pet flea control chemicals can pass through wastewater treatment plants and pass directly into the aquatic environment. Additionally, there is acute and chronic risk to humans from use of these products—especially children and dog groomers. Sustainable pest management alternatives are needed to reduce urban use and therefore reduce risk in urban environments.