

**RE: Imidacloprid Groundwater Detection – CA Pesticide Contamination Prevention Act (PCPA)**

To Whom It May Concern,

Thank you for the opportunity to comment on **Imidacloprid Groundwater Detection – CA Pesticide Contamination Prevention Act (PCPA)**. I am wholesale nursery selling citrus to northern California independent garden centers.

I would like to *raise concerns* regarding Imidacloprid use in California agriculture.

- 1. We do not have a suitable replacement to meet regulatory requirements*
- 2. We do not have a cost-effective replacement.*

In summary, we need to be able to utilize Imidacloprid in a well-rounded

Sincerely,

*Roger van Klaveren*

*President*

*Generation Growers, Inc.*

**Submit by February 18, 2022 via e-mail to [PCPA.Comments@cdpr.ca.gov](mailto:PCPA.Comments@cdpr.ca.gov) or mail to:  
PCPA Imidacloprid Comments  
Attn: Kara James  
Pesticide Registration Branch  
1001 I Street  
Sacramento, CA 95814-4015**