



February 8, 2022

The Honorable Julie Henderson  
Attn: Kara James, Pesticide Registration Branch  
California Department of Pesticide Regulation (CDPR)  
1001 I. Street  
Sacramento, CA 95814-4015  
[PCPA.Comments@cdpr.ca.gov](mailto:PCPA.Comments@cdpr.ca.gov)

***RE: Pesticide Contamination Prevention Act Imidacloprid Comments***

Director Henderson:

On behalf of the California Citrus Mutual and its citrus grower membership throughout the State, we submit these comments for consideration as the Department of Pesticide Regulation (DPR) proceeds to review the use of Imidacloprid products subject to the Pesticide Contamination Prevention Act (PCPA) review process. As review takes place, we encourage DPR to heed the available science and work towards methods that are sustainable for all parties involved.

The use of imidacloprid, is applied in a rotation with other neonic pesticides and is one of the tools available in a citrus grower's toolbox against the Asian citrus psyllid which can contain the infectious citrus greening disease or also known as huanglongbing (HLB). This citrus disease has made its way into the U.S and is responsible for the plight of the Florida Citrus industry in the early 2000's. However now in California, imidacloprid provides a safety net for citrus growers and ensures sustainability of citrus on an agronomic basis.

Although imidacloprid application continues, the presence of imidacloprid is not as widespread in wells. Well monitoring data available from the DPR website was evaluated by sampling locations and the frequency of imidacloprid detections:

- A total of 658 individual samples were obtained from 365 wells in 20 different counties in California. Although sampling data is reported as early as 2003, most sampling occurred in the 2014-2020 timeframe.

- 627 were below DPR's reporting threshold of 0.05 ppb,
- 30 samples gave detectable levels above 0.05 ppb, with one at 0.05 ppb.
- Values >0.05 ppb ranged from 0.051-5.97 ppb, constituting only 4.6% of the total number of samples.
- This data highlights that 95.4% of the 658 samples did not contain levels of imidacloprid above the 0.05 ppb detection threshold.

Additionally, United States Geological Survey (USGS) and the California State Water Resources Control Board (SWRCB) data provides similar insights to imidacloprid detections whereas:

- 1075 samples from 1021 wells across 45 counties in the 2004-2020 timeframe showed only two samples (from Fresno Co.) above 0.05 ppb at levels of 0.056 ppb and 0.091 ppb.
- Inclusion of these detections along with those obtained by DPR results in 1.8% detections across the state from 2003-2020.

In summary, DPR, SWRCB & USGS collective data sets convey that imidacloprid has not polluted nor constitutes a public health crisis as the detectable levels have not approached DPR's Human Health Assessment (HHA) level of 283 ppb—which does pose a health concern according to HHA standards. We thank DPR for this opportunity to provide public comment on the PCPA review. Should there be any questions regarding the content of this letter please do not hesitate to reach me at [Jacob@cacitrusmutual.com](mailto:Jacob@cacitrusmutual.com).

Sincerely,



Jacob Villagomez  
Director, State Governmental Affairs  
California Citrus Mutual