



February 15, 2022

PCPA Imidacloprid Comments
Attn: Kara James
Pesticide Registration Branch
1001 I Street Sacramento, CA 95814-4015

Subject: Pesticide Contamination Prevention Act (PCPA) review process – Imidacloprid

Dear Ms. James,

On behalf of the California Golf Course Superintendents Association, its six affiliated chapters and over 2,000 members, please accept the following comments regarding the Pesticide Contamination Prevention Act (PCPA) process review on Imidacloprid.

Imidacloprid is a safe and reliable tool for control of insects on golf courses throughout California. It is highly effective on grub populations and is also used to control key pests of ornamentals, trees and shrubs that are also part of the golf course. Imidacloprid also provides a high degree of worker and player safety (low toxicity, Category III), and flexibility in application. It's loss of use would have a negative impact on California's \$13.2 billion golf industry.

The California Department of Pesticide Regulations (CDPR) detected imidacloprid in groundwater at concentrations up to 5.97 parts per billion (ppb) in 15 wells across three California counties. CDPR scientists already established concentrations of imidacloprid in groundwater < 283 ppb as protective of human health. The highest reported detection from CDPR's imidacloprid sampling (5.97 ppb) was more than 45 times lower than levels of concern. The use of imidacloprid does not pose a risk to human health.

California golf course superintendents are focused on sustainability and integrated pest management, a philosophy that reduces the potential environmental risks of pesticide usage. Golf courses employ state licensed pesticide applicators who are trained in responsible pesticide use. Additionally, California golf courses employ Best Management Practices (BMPs) that minimize the impact of pesticides on pollinators, off-site movement, and water contamination. The California Golf Industry BMP can be viewed at <https://www.gcsaa.org/environment/bmp-planning-guide/best-management-practices/state-bmp-guides>. Its available in both English and Spanish.

The effectiveness of Imidacloprid, its breadth of activity and utility in controlling difficult pests would be hard to replace, and some of the alternatives have significant economic and environmental disadvantages. We kindly request that the CDPR use a science-driven approach during the review process that focuses on the data.

Thank you for your time and consideration,

A handwritten signature in black ink, appearing to read 'Jeff Jensen', with a long horizontal flourish extending to the right.

Jeff Jensen
GCSAA Southwest Field Representative
California Golf Course Superintendents Association
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