

Control of Wood Destroying Pests —

NMAC 21.17.53 Public Comments

Name: Alan Feuer, ACE Technical and Leadership Consultant Associate Certified Entomologist Emeritus

Email: alan@ppcabq.com

Submitted on: June 24, 2026, 9:43 AM

Comment: I make the following suggestions, all based on the 7D rules update.

1. For consistency, perhaps consider changing the term "licensed termite service technician" to "wood destroying pest operator". This aligns with the term "operator" used elsewhere in the rules. Additionally, replacing "termite" with "wood destroying pest management" would clarify that this role is NOT just for termites.
2. Perhaps this is also the time to better define the recordkeeping expectations for the "detailed drawing on graph paper," which has been an issue for quite some time. I might suggest the following details.
 1. For all control efforts targeting wood-destroying organisms that involve pesticide use, a detailed drawing on graph paper is required. This drawing must be to scale, with linear measurements accurate within 5% (e.g., a 50-foot measurement must be recorded within +/- 2.5 feet). Additionally the following details must be included.
 1. All foundation details must include the type (monolithic, floating, crawl, basement), footing depth, interior foundation breaks and elevation changes (at garages, sunken rooms, additions, etc.) and any other treated elements such as crawl space piers, plumbing stacks and penetrations, interior control joints and settlement cracks.
 2. List all infestation points identified on the date of treatment, including the type of wood destroying organism the treatment was intended to manage.
 3. All treatment points and locations for pest control must clearly indicate the control measure or method used.
 4. Identify any areas of the structure not treated to label specifications/requirements and the reasons why.