



November 8<sup>th</sup>, 2025

Department of Pesticide Regulation  
Pesticide Evaluation and Registration Branch  
1001 I St, Sacramento, CA 95814

RE: DPR "Anticoagulant Rodenticide Mitigation Informal Public Comment"

To whom it may concern,

Thank you for the opportunity to provide comments on the proposed regulations regarding the continued use of Anticoagulant Rodenticides (ARs) for specific sites and uses in California. I am submitting this comment on behalf of the University of California (UC), Systemwide Pesticide Oversight Committee, which consists of UC Staff, academics, and internal stakeholders responsible for implementing and overseeing an Integrated Pest Management Policy across all UC properties.

Overall, we support certain aspects of the proposed regulatory framework for the continued use of these chemicals. Specifically, we support the use of refined language for specific "sites" that will incorporate the description of restaurants and grocery stores in the regulatory code. And the maintained exempted uses to address public health concerns as outlined in the currently allowed uses (FAC 12978.7).

Regarding the training requirements of Sustainable Rodent Management, we recommend developing the required training by partnering with the expertise available within the UC System. This should include collaboration with the UC Statewide IPM program, which houses extension specialists and subject matter experts in the field of rodent research and educational development for pest management professionals and pesticide applicators. Additionally, the training should count towards continuing education units for both DPR and SPCB license and certificate holders. This will incentivize participation and ultimately lead to a more qualified workforce in Integrated Pest Management (IPM) and Sustainable Pest Management (SPM) for controlling rodent populations.

We suggest extending the proposed 12-month delay between the effective date and the training to 18 or 24 months. This extension will ensure a comprehensive and well-informed educational curriculum is developed, meeting all the principles of IPM and SPM as outlined in the relevant sections of the FAC, as well as aligning with current academic and industry practices.

We believe that with the careful implementation of proposed regulations DPR will be closer to a balanced approach that effectively manages rodent populations while minimizing risks to wildlife. We appreciate the opportunity to share our insights and look

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forward to supporting the continued development of effective, safe pest management practices in California.

Sincerely,

A handwritten signature in black ink that reads "Jasmin Ramirez Strain".

**Jasmin Ramirez Strain**  
University of California  
Center of Excellence Integrated Pest Management Lead