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11-8-2025

Jennifer "JT" Teerlink, PhD  
Deputy Director, Registration and Evaluation  
California Department of Pesticide Regulation

RE: Draft Proposed Anticoagulant Rodenticide Regulations

Deputy Director Teerlink,

For more than a decade, my company, Humane Wildlife Control Inc., has proven that poison-free rodent control is not only possible but superior. Our approach - based on structural repairs and sanitation - has resolved thousands of rodent infestations permanently and affordably, and without risk to the environment.

The solution is simple: take away what attracts rodents (food) and eliminate their access into buildings, and the problem ends. What we are seeing is overuse of rodenticides by the pest control industry and it comes down to money - profit.

Poisons don't offer true protection!

Rodents gain access through structural vulnerabilities that can be permanently sealed. Unless those entry points are addressed, more rodents will continue to intrude - no matter how much poison is used!

The presence of rodents is a symptom, not the actual problem - an indication of a nearby reliable food source that is attracting and sustaining them.

Poison merely attempts to mask the symptom - it doesn't address the real problem, and in many cases, it makes the situation worse.

Poison bait acts as an attractant, luring animals toward and into buildings. Should they die inside, their parasites - fleas and mites - seek out nearby warm blooded hosts, often resident humans or pets.

The science is clear. Research consistently confirms that exclusion and sanitation are the most effective ways to resolve rat and mouse infestations. Yet few pest control companies offer these services. The vast majority still push rodenticides because doing so guarantees them repeat business.

The pest control industry has fought hard to suppress legislative and public efforts to reduce poison use, defending a business model built on lies and deception - profiting from allowing infestations to remain, not eliminating them.

Companies that profit from monthly bait-station contracts have no incentive to eliminate infestations. On the contrary, they profit from their continuation. Like drug dealers, they need to keep customers hooked through fearmongering, sensationalism, and misinformation.

This is the absolute truth. I know it, I live it.

But, imagine, if pest control companies understood they could make just as much profit - if not more - by doing the right thing: fixing the problem instead of feeding it? Hello?

Beyond questions of effectiveness, rodenticides contaminate wildlife. The contamination is widespread. And from firsthand experience, I know we've only seen the tip of the iceberg.

It's reminiscent of DDT - except now, the victims die unseen, undiscovered, undocumented.

Yet, the Department is moving to weaken protections instead of strengthening them!

The agencies entrusted with protecting our environment are failing...

We have no independent, verifiable evidence that tells the TRUE story of the extent of the contamination. None! Yet, the Department is moving to weaken protections.

Until DPR can show - through truly independent, verifiable evidence - that wildlife exposure is both significantly and sustainably declining, the moratorium must stay in place.

From there, we must work TOGETHER to build regulation that supports responsible industry practices without sacrificing wildlife or misleading the people of California.

May I suggest a working group?

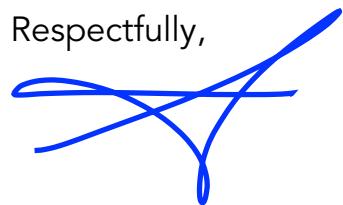
It is incumbent upon the Department to lead California away from its chemical dependence and toward proven, environmentally sound practices.

Exclusion, sanitation, and maintenance must be the legal foundation of rodent management. Poisons, if ever used, should be limited to short-term, targeted interventions under strict supervision - a true last resort.

California can and should lead the nation truly sustainable, effective, and poison-free rodent management.

The solutions exist. What's needed now is the courage to implement them.

Respectfully,

A handwritten signature in blue ink, appearing to read "Rebecca Dmytryk".

Rebecca Dmytryk  
CEO, Humane Wildlife Control Inc.  
Human-Wildlife Conflict Specialist