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Jennifer “JT” Teerlink, PhD
Deputy Director, Registration and Evaluation
California Department of Pesticide Regulation
1001 I Street, Sacramento, CA 95814

RE: Draft Proposed Anticoagulant Rodenticide Regulations - Public Comment

Deputy Director Teerlink,

I submit these comments as the CEO and founder of Wildlife Emergency Services, with over forty years of hands-on experience rescuing wild animals throughout California. I have personally collected and submitted dozens of specimens for toxicological testing - some showing illness, others found dead without apparent injury. Nearly all tested positive for anticoagulant rodenticide contamination. These results reveal a pervasive and ongoing toxic burden that current monitoring practices may be failing to capture.

The sampling protocol used by the California Department of Fish and Wildlife (CDFW) and reported to Department of Pesticide Regulation (DPR) appears to exclude many opportunistic specimens - animals found dead from unknown causes that could reveal chronic or sublethal poisoning.

For example, a few months ago I requested toxicology testing of a coyote carcass from an area known for heavy use of restricted anticoagulant rodenticides. Rather than welcome the opportunity to collect valuable data, CDFW's Wildlife Investigations Laboratory (WIL) initially refused to process the sample even when I offered to pay for the analysis in full. The resistance was not scientific; it was institutional, and raises serious questions about who controls what gets tested and reported.

It should come as no surprise, given the long-standing and deeply entangled relationship between DPR and CDFW - one in which DPR funding and oversight appear to shape what is tested, how results are reported, what content is approved for dissemination and ultimately what the public is allowed to know. DPR's own contracts and billing records show that CDFW's toxicology staff have been partly paid with DPR funds. Invoices and emails suggest DPR reimbursed CDFW for staff time and overhead related to rodenticide investigations. **In other words, the agency that regulates poisons is also paying the scientists whose data it relies on to defend their continued use.** And because DPR's budget comes largely from a tax on pesticide sales, both **its funding and its science are tied to the very poisons it oversees.**

It is, quite literally, the fox guarding the henhouse.

How can the public trust any proposed safeguards when the science behind them is produced within the same system that profits from the poisons it defends?

This conflict of interest has real consequences. The proposed mitigation measures may be based on incomplete and misleading data that underrepresent the true impact anticoagulant rodenticides are having across California's ecosystems. And on the ground, we see no evidence of improvement.

From firsthand experience, we continue to see wildlife poisoned by rodenticides - cases that reveal ongoing misuse and even the persistence of products that have been banned for years. **Until DPR can show that existing restrictions are enforced and that exposure is truly declining, it cannot credibly justify expanding use or making these poisons easier to obtain.**

We respectfully ask that the Department withdraw all provisions that expand use sites, and we ask that use of rodenticides be prohibited in wildlife habitat and near wildlife corridors. We ask that documentation of preventive measures be required before any poison use. Restricted-use controls must be restored, and permitting loopholes closed. Additionally, oversight must be transparent. DPR must publish all data, agreements, and analyses supporting any findings, including evidence of reduced exposure.

No rulemaking can be considered legitimate when it relies on data generated within a conflicted system - where the agency's revenue is tied to the sale of the poisons under review, and the very evaluators of the impact of those poisons are paid by the agency itself. Therefore, there must be an independent statewide wildlife monitoring program that is free from DPR's financial influence and DPR must create and maintain a clear fiscal and administrative firewall between pesticide-derived revenue and wildlife oversight to ensure objectivity and restore public trust.

Most importantly, **the moratorium must remain until a significant and sustained decline in wildlife exposure is demonstrated.**

Respectfully,

Rebecca Dmytryk
CEO & Founder, Wildlife Emergency Services
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