

CALIFORNIA LEGISLATURE

STATE CAPITOL
SACRAMENTO, CALIFORNIA
95814

November 8, 2025

Karen Morrison, Director
California Department of Pesticide Regulation
1001 I Street
Sacramento, CA 95814

RE: Anticoagulant Rodenticide Draft Mitigations

Dear Director Morrison,

We, the undersigned members of the Legislature, write to emphasize the importance of the laws restricting anticoagulant rodenticide use and to express concern, as outlined below, regarding the deficiencies of the California Department of Pesticide Regulation (DPR)'s draft proposed anticoagulant rodenticide regulations released to the public in September 2025. We further request clarification regarding DPR's process for developing the regulations and changes to subsequent regulatory language.

The use of rodenticides to control rodents has resulted in widespread unintentional poisonings of pets and non-target wildlife throughout California, including the golden eagle, great-horned owl, black bear, fisher, San Joaquin kit fox, coyote, mountain lion, bobcat, and badger. Rodenticides can also pose human health risks, as evidenced by recent headlines about "blue pigs" harvested by hunters in California. According to the California Department of Fish and Wildlife (DFW), the blue tissue coloration in these animals is a sign of rodenticide poisoning.

Since the passage of AB 2657 in 2014 (AB 2657, Bloom, Chapter 475, Statutes of 2014), the Legislature has worked to increasingly restrict the use of anticoagulant rodenticides in California to protect non-target wildlife, pets, and the public from the well-documented risks of exposure to these chemicals. These laws, culminating with the Poison Free Wildlife Act of 2024 (AB 2552, Friedman, Chapter 571, Statutes of 2024), enacted a moratorium on uses of all anticoagulant rodenticides, to be rescinded only after DPR completed reevaluations of anticoagulant rodenticides and enacted regulations restricting their use, as delineated in statute. Among other requirements of the Act, the regulations must require the implementation of Sustainable Pest Management (SPM) and Integrated Pest Management (IPM) prior to the use of anticoagulant rodenticides and ensure decreases in the exposure of wildlife to those pesticides.

Please find below our initial comments on DPR's draft proposed anticoagulant rodenticide regulations released to the public in September 2025.

Ensure Implementation of Sustainable Pest Management and Integrated Pest Management

We commend DPR on the steps it is taking to develop an SPM framework, which has long been a priority for the Legislature. In 2019, the Assembly Environmental Safety and Toxic Materials Committee analysis for AB 1788 stated, "Instituting stronger state support of, or requirements for, integrated pest management approaches to rodent control would likely reduce the use of rodenticides overall."

California Food and Agriculture Code Section 12978.7 requires that DPR's anticoagulant rodenticide regulations "include a requirement to implement sustainable pest management and integrated pest management practices, such as biological control, habitat manipulation, and modification of cultural practices, before the use of" anticoagulant rodenticides. While the draft anticoagulant rodenticide regulations require increased training, planning, and recordkeeping, the requirement to implement IPM and SPM practices to avoid and reduce anticoagulant rodenticide use is flimsy and unclear [proposed California Code of Regulations (CCR) §6471.5(b)(4)]. To comply with state law, the regulations must include an explicit requirement for implementation of IPM and SPM practices *before* the use of any anticoagulant rodenticides.

Ensure Restrictions Lead to Reductions in Wildlife Exposure; Justify Any Proposed Expansions of Allowable Use

Anticoagulant rodenticides are some of the most widespread poisons found in wildlife. For example, the DFW 2023 "Pesticide Exposures & Mortalities in Non-target Wildlife" report found that 71.9% of wildlife tested were exposed to anticoagulant rodenticides. To ensure reductions in exposure, Food and Agriculture Code Section 12978.7 requires that DPR adopt "additional restrictions necessary to ensure a trend of statistically significant reductions in the percentage of wildlife exposed" in order for any moratorium on anticoagulant rodenticide uses to be rescinded.

While we appreciate that DPR proposes restrictions for some currently allowable uses of anticoagulant rodenticides, DPR has also proposed regulations that, among other things, actually increase the scope of allowable use of anticoagulant rodenticides by permitting their use at places such as restaurants [proposed CCR §6471(a)(8)] and grocery stores [proposed CCR §6471(1)(7)]. The proposed regulations also allow use for up to 105 days (three 35-day periods) each year at a single site. DPR has not demonstrated how increasing the allowable uses and allowing for repeated use can ensure statistically significant reductions in wildlife exposure. We request that DPR demonstrate how expanding the allowable uses and allowing for repeated use will ensure reductions in wildlife exposure.

Ensure Consultation with and the Concurrence of DFW

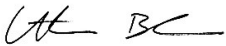
California Food and Agriculture Code Sections 12978.7(i), (j), and (k) require that DPR consult with and obtain the concurrence of DFW in the adoption of regulations and restrictions related to anticoagulant rodenticides. It is unclear from the materials provided by DPR whether this occurred in relation to the proposed regulations or, if it did occur, what the outcome of that consultation and concurrence process was. DPR should provide information to the Legislature and the public describing the process and results from “consultation with” and the “concurrence of” DFW in developing the regulations, as required by Food and Agriculture Code Sections 12978.7(i), (j), and (k).

Justify Exemption from Restricted Use Permitting Process

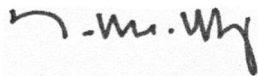
DPR’s proposed regulations add first generation anticoagulants to the category of “restricted materials” pesticides, placing them on parallel status with second generation anticoagulant rodenticides, which are also restricted. However, DPR proposes to exempt all anticoagulant rodenticides from the permit requirements for restricted materials. We are concerned that the universal exemption of permitting requirements runs contrary to the Legislative intent to place these pesticides in the restricted materials category.

The development of regulations for anticoagulant rodenticides provides DPR with an important opportunity to demonstrate California's commitment to and implementation of SPM and IPM. We look forward to hearing from DPR regarding our concerns.

Sincerely,



Catherine S. Blakespear
Senator, District 38
Chair, Senate Environmental Quality Committee



Damon Connolly
Assemblymember, District 12
Chair, Assembly Environmental Safety and Toxic Materials Committee



Alex Lee
Assemblymember, District 24



Diane Papan
Assemblymember, District 21
Chair, Assembly Water, Parks, and Wildlife Committee



Nick Schultz
Assemblymember, District 44



Henry Stern
Senator, District 27

cc:

Alejandra Durán
Deputy Director of Legislation and Policy
Department of Pesticide Regulation

Jennifer Teerlink
Deputy Director, Pesticide Programs Division, Registration, Evaluation and Human Health
Assessment
Department of Pesticide Regulation

Sapna E. Thottathil
Deputy Director and Special Advisor, Sustainable Pest Management
Department of Pesticide Regulation