



**BACKCOUNTRY
HUNTERS & ANGLERS
CALIFORNIA**

November 8, 2025
Department of Pesticide Regulation
1001 I Street (P.O. Box 4015)
Sacramento, CA 95814

Re: Public Comment on Draft Proposed Anticoagulant Rodenticide Regulations

Dear Director and DPR Team,

On behalf of Backcountry Hunters & Anglers (BHA), I am writing to express support for the California Department of Pesticide Regulation's (DPR) continued efforts to address the ecological risks posed by anticoagulant rodenticides (ARs). BHA represents hunters, anglers, and outdoor recreationists in California and across the nation who depend on healthy, functioning ecosystems to sustain wildlife populations and public access. We appreciate DPR's science-based approach to minimizing secondary poisoning of non-target species and safeguarding the state's diverse wildlife.

Ecological Risk and Non-Target Exposure

Anticoagulant rodenticides, especially second-generation compounds, have been documented to move through the food chain and accumulate in predators and scavengers. While raptors and small carnivores are among the most frequently observed victims of secondary exposure, larger species—including black bears, bobcats, mountain lions, and feral pigs—can also be affected.

In particular, black bears are highly capable of breaching or accessing bait stations, dumpsters, and feed storage areas that may contain poisoned rodents or bait blocks. Once exposed, bears can experience both direct poisoning and indirect impacts through contaminated prey or carrion. Because these are managed game species in California, the potential for contamination has implications for both wildlife health and human health following consumption of the meat.

Feral pigs are also susceptible to both primary and secondary exposure, scavenging on poisoned carcasses or consuming contaminated bait. Their wide range and high mobility increase the risk of spreading contaminants across landscapes, potentially affecting other wildlife and the broader food web, including hunters who pursue them for their meat.

Monitoring and Data Collection

BHA supports DPR's focus on environmental monitoring and recommends expanding testing and reporting to include large mammals such as bears and feral pigs. Collaboration with the California Department of Fish and Wildlife (CDFW), universities, and volunteer sampling programs could provide valuable data from hunter-harvested animals or carcasses recovered in the field.



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We also encourage DPR to consider establishing a dedicated toxicology monitoring fund—separate from disease surveillance—to support testing and data transparency. This fund could be supported through grants, registrant fees, or cooperative agreements with research partners and conservation organizations.

Integrated Pest Management and Preventive Measures

BHA supports DPR’s approach to requiring Integrated Pest Management (IPM) practices before allowing AR use. Producers and applicators should demonstrate rodent-proofing measures such as sealed feed storage, exclusion barriers, and improved sanitation before resorting to ARs. Use should be limited to enclosed, tamper-resistant bait stations, and documentation of preventive measures should be a prerequisite for authorization.

Habitat-based control strategies—such as raptor-friendly programs that promote natural predation—have proven to be effective and compatible with agricultural operations. Expanding these approaches would reduce dependency on persistent toxins while benefiting both landowners and wildlife.

California has an opportunity to strengthen its leadership in science-driven wildlife management by ensuring that AR regulations reflect the full scope of ecological exposure—particularly among large mammals that play key roles in the landscape and those that are commonly hunted for their meat. Backcountry Hunters & Anglers appreciates DPR’s attention to these issues and stands ready to assist with outreach, field collaboration, and monitoring partnerships as the rulemaking process moves forward.

Sincerely,

Devin O’Dea
Western Policy & Conservation Manager
Backcountry Hunters & Anglers



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