



# CONTRA COSTA COUNTY

## Department of Agriculture / Weights & Measures

**Matthew Slattengren**  
Agricultural Commissioner  
Director of Weights & Measures

### Main Office

2380 Bisso Ln., Suite A \* Concord, CA 94520  
Office: (925) 608-6600 \* Fax: (925) 608-6620

### Branch Office

3020 Second St. \* Knightsen, CA 94548  
Office: (925) 427-8610 \* Fax: (925) 427-86

Thank you for providing the opportunity to submit comments on DPR's proposed anticoagulant rodenticide regulations. The Contra Costa County Department of Agriculture has spent years protecting public infrastructure, including county owned roads, airports, dams and levees from ground squirrels with diphacinone until the site restrictions imposed by AB 2552 curtailed most of this work. Diphacinone may now only be used to protect the drinking water supply, leaving the remaining public infrastructure to deteriorate.

We have tried alternatives, such as gas cartridges and live trapping, but they are labor intensive, cost prohibitive, and potentially hazardous to staff.

After attending the workshop on September 24<sup>th</sup>, 2025, we suggest the following changes to the proposed regulations:

- There needs to be a public safety exemption to allow first generation anticoagulant rodenticides (FGARs) to be used around airport runways. Airport runways are critical infrastructure where ground squirrel damage could endanger lives. There are federal regulations that airports cannot effectively follow without the use of FGARs, such as Code of Federal Regulations 139.337.
- The term "water infrastructure" should be used instead of "water supply." Our county counsel sees "water supply" as meaning drinking water, when there is real need to protect dams and levees as well.
- An exemption should be added for "Public Infrastructure." This should also capture most "Water Infrastructure" as well. If we cannot protect our public infrastructure like roads, dams, and levees, we will need to repair them all constantly so as not to create other public hazards. This is a wasteful use of public funds easily avoided with proper and safe applications of FGARs. We have evaluated other methods and none that we reviewed are economically or logistically feasible.
  - California Government Code, section 11813 states, in part:  
"The Legislature finds and declares the following:  
(a) Waste and inefficiency in state government undermine the confidence of Californians in government and reduces the state government's ability to adequately address vital public needs."

Current prohibitions on the use of FGAR's contribute to this undesired outcome. Exemptions allowing for their use to protect public infrastructure would ameliorate this problem.

Thank you for your time and consideration.

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