



County Administration South
601 North Ross Street
Santa Ana, CA 92701

P.O. Box 4048
Santa Ana, CA 92702

(714) 667-8800

info@ocpw.ocgov.com

OCPublicWorks.com



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November 5, 2025

Brian Glenn
2301 N Glassell St.
Orange, CA 92562

RE: Anticoagulant Rodenticide Mitigation Informal Public Comment

The Orange County Flood Control District manages approximately 3500 acres of flood control facilities where rodent control is deemed critical for maintaining structural integrity of slopes and levees. These channels, basins, and dams were built to protect the over three million residents of Orange County from the threat of catastrophic flooding which has historically occurred throughout much of the area.

Current regulations have limited the options to control damaging burrowing rodents including the California ground squirrel and Botta's pocket gopher. Damage caused by these and other burrowing animals has been implicated in numerous levee failures that have led to the loss of both property and life. With the loss of the use of anticoagulants physical trapping has been employed in the areas with highest activity but to ensure continued facility integrity the threshold for damage is very low. Since the beginning of the FGAR limitations this year, most of our facilities remain underserviced due to the increased labor requirements for manual trapping.

Current exemptions included in AB 2552 include those facilities critical to the drinking water supply. I urge the **expansion of exempted sites to include facilities critical to flood infrastructure** to maintain public safety for millions of our county residents. This refinement would aid substantially in keeping effective options available to protect life and property throughout Orange County and the state.

Sincerely,

Brian Glenn, Ph.D.
Manager, Integrated Pest Management Unit
Orange County Public Works