



CITIZENS FOR
LOS ANGELES
WILDLIFE

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November 8, 2025

California Department of Pesticide Regulation (DPR)
1001 I Street
Sacramento, CA 95814

Via: <https://cdpr.commentinput.com/?id=JsSRaG6NA>

RE: Draft Proposed Anticoagulant Rodenticide Regulations

To Whom It May Concern:

Citizens for Los Angeles Wildlife (CLAW) is a non-profit environmental organization concerned with the wellbeing of wildlife and wildlife habitat for the City of Los Angeles and beyond. A citizenry of more than 5,000 individuals support our organization's multiple calls for practices and policy to benefit biodiversity in LA City, County, California and the globe. While we appreciate being included in DPR's recent public workshop, we have a few concerns:

1. **New exempted areas should not be added for rodenticide usage.** Mitigation and harm reduction is not accomplished by adding more areas in which rodenticide can be used. If the intent of this proposal is truly to mitigate, then adding new exemptions would be in direct conflict with this goal. The proposal should not add additional exemption areas or additional periods of use if they are not already enumerated within existing law.
2. **DPR's reevaluation should take priority.** Our particular concern is that DPR's proposal is meant to supersede the legal moratoriums and reevaluation requirements for Anticoagulant Rodenticide. With the reevaluation of these chemicals still ongoing, stakeholders cannot be fully informed when giving feedback on new proposals. Regardless of whatever policies may be proposed for the future, California's current moratoriums must not be lifted until science-based reevaluations are completed.
3. **Urban areas should not be overlooked for their critical ecology.** Los Angeles lies within a biodiversity hotspot, with unique animals such as mountain lions, and endemic plants and animals throughout the ecologically rich Santa Monica Mountains. LA County also boasts more bird species than any other county in the United States. While less developed areas crucially require protection measures, DPR should resist any tendency to lessen restrictions within urban areas based on the false assumption that widespread impacts on wildlife do not occur.

Thank you for your consideration of these concerns.

Sincerely,

Tony Tucci, Chair

CLAW is a public benefit non-profit 501(c)(3) environmental organization that works to protect and restore the environments of wildlife of Los Angeles and California from dwindling open spaces. Our mission is to promote, educate and protect the fundamental importance of wildlife, wildlife habitats and wildlife corridors everywhere.