John Callaway

I am writing to strongly oppose the proposed changes which will weaken anticoagulant rodenticide regulations in CA. I am a long-term restoration ecologist, who has worked mostly with plants, but I also am deeply interested in creating habitat and improving conditions for bird populations. Creating habitat is important, but if we are impacting wildlife with anticoagulants this will substantial reduce our restoration and management efforts. Many bird species and other non-target wildlife are negatively impacted by anticoagulant rodenticides. Raptors in particular eat substantial numbers of rodents and can be severely impacted. We've made great strides with many raptor populations by reducing other pollutant impacts, e.g., DDT, lead, etc., but anticoagulant rodenticides could reverse many of these gains.

We cannot wait to enact this protections. The current law has a provision for research to study non-target wildlife poisoning over the next two years and produce vetted research that supports less restrictive mitigations. Until the research period has ended and supporting research has been produced, less restrictive protections should not be allowed. We can not afford potential impacts during this testing period.

Similarly, no grace period in usage should be permitted for holistic rodent management training. Effective Integrative Pest Management (IPM) strategies are available and should be used until this training is completed. We cannot allow for the use of anticoagulant rodenticides during a training period or this will lead to substantial impacts to non-target wildlife.

And finally, while rodent problems at restaurants or grocery stores are an issue, these should be addressed on a case by case basis. We should not allow for a wholesale exemption of regulations for all restaurants and grocery stores, or this will result in large-scale wildlife impacts.

Thanks for considering this input, and again, I urge you to protect wildlife and not weaken constraints on the use of anticoagulant rodenticides.