

Daniel Scali

Dear Officials,

As a concerned citizen and passionate birder, I'm really grateful that California has gone much further to restrict anticoagulant rodenticides than any other state in the country. I don't think all of the legal exemptions are a long-term regenerative solution — which is the only solution that will pull us out of our global environmental crises — but let's work with compromise for now.

The exemption for research will allow you to fully study problems of nontarget wildlife poisoning in order to produce the evidence required under the law that would allow any mitigations you propose that are less restrictive. Until you produce real comprehensive evidence (don't you have 2 more years?) with multiple department collaboration I feel your proposals to remove permitting requirements and allow new exemptions for restaurants and grocery stores are illegal. If rodent problems at a specific restaurant or grocery store become a public health issue, public health officials can deal with those specific emergencies without exempting all of those sites.

I also urge you not to allow a grace period for the holistic rodent management training and plan. Applicators should have to wait until they are trained to start operating. They can use IPM strategies and non-ARs until they complete the training.

Title: AN UPDATE ON CALIFORNIA'S RODENTICIDE BANS, FOUR YEARS LATER

By Dan Scali

Urgent: On September 24, the California Department of Pesticide Regulation (CDPR) presented proposed mitigations for the use of blood thinning rodent poisons (anticoagulant rodenticides or ARs) as part of navigating the moratorium on all ARs. California law requires the department to show a meaningful reduction in the levels of ARs persisting in the bodies of non-target wildlife, before they can lift any of the law's use restrictions. One of the more recent studies is [this paper](#) published in The Journal of Wildlife Management in October of 2024, which found that 98.1% of urban (including suburban) coyotes in Southern California were exposed to at least 1 AR. The department has shared no new studies, yet overall, their mitigations would allow a drastic increase in usage.

The window for sharing public comment closes on November 8. Details to follow.

I've been procrastinating for months now on writing this update to [my 2021 blog post](#) about California's ban on rodent poisons known as Second Generation Anticoagulant Rodenticides (SGARs). Advocacy for environmental issues can feel so detached when results move at nature's intended pace. Plus, the atrocities the Trump administration is perpetrating or planning to, on people and the planet, make many issues seem trivial in comparison. Meanwhile, raptors, mountain lions, and other wild animals nationwide continue to get sick, and often die by ingesting anticoagulant poisons designed to slowly kill rodents from internal bleeding. It's a sure cause of suffering even the rats don't deserve. I wish to apologize to our wildlife neighbors for my tardiness.

On the rodenticide issue, there is cause for optimism in California as long as individuals, organizations, and legislators continue to act. To catch everyone up to speed, the proponents of bans on ARs did not stop organizing after the 2020 passage of AB 1788 put a moratorium on most uses of the more toxic second generation products. Despite the lower potency of First Generation Anticoagulant Rodenticides (FGARs) and industry preference for their more lethal cousins, there was already years worth of evidence that first generation poisons too, were showing up in non-rodents both directly and via poisoned prey. Plus, non-target consumption of FGARs was sure to skyrocket with the law allowing the pest control industry to largely continue using said variety of AR products; which, require more feedings to kill their targets.

The advocates succeeded. They passed two more rodenticide bills, AB 1332 in 2023, and AB 2552, in 2024. The latter, known as The Poison-Free Wildlife Act, made the moratorium on ARs complete, with the addition of the two remaining FGARs. Sure the exemptions for things like public health emergencies and agricultural production continue to put ARs in ecosystems but at least the law created a stronger deterrent to illegal sale or use; civil penalties of up to \$25,000 per day. Since I started working on this project back in April I've been pleasantly surprised when coming across bait stations in San Francisco and other cities nearby. Many are labeled with products that say CA only, meaning pest control companies are doing business differently here. These California products are versions of brand name ARs with no anticoagulants. So far, nowhere else in the US has banned either generation AR at the state level. Even online retailers do not allow AR products to be shipped to California.

Folks with a lot more experience agree that the bans are being followed. To do research for this update, I checked in with Lisa Owens-Viani, who co-founded Raptors Are The Solution (RATS) in Berkeley in 2011. Her advocacy promoting birds of prey as sustainable rodent control and opposing anticoagulants with other wildlife defenders has played a huge role in getting

California where we are now. I told her I had seen some bait stations where the sticker labels had likely come off, were poorly marked, or completely unmarked. However, I had also noticed only a few labels with any anticoagulants at all. She agreed that the laws were generally being followed but recommended we stay vigilant; powerful opposing interests are not going away.

Since Lisa and I spoke, I've found three bait stations out of compliance with the law. One, outside a CVS near Rossmoor, had a peeling label with only banned FGARs as options to check off. Another, outside of the Costco by SFO, had two confusing markings which indicated that the bait inside was either Contrac Soft Bait, a SGAR, Fastrac Soft Bait, a legal poison, or both. The third, I spotted while birding in my neighborhood in the Richmond. The box was behind an apartment complex and nothing was checked off on the label. I reported each as recommended by legislation, by sending a photo and description to the appropriate County Ag Commissioner. Contra Costa and San Mateo County pesticide enforcement staff responded immediately with a plan to investigate. Both cases got resolved, and a San Francisco regulator has also been responsive. This feels like sympathetic local government standing up for environmental justice. It's a great feeling, and one that we can build on, by working together to hold regulators accountable.

I learned about CDPR's recent mitigation proposals on October 14, when Lydia Bruno, the Golden Gate Bird Alliance's San Francisco Conservation Committee co-chair, sent me [RATS'](#) [Instagram Alert](#) calling the department out for "major backsliding" and saying the mitigations would "greatly weaken" the established bans. Before I list the proposals which RATS, The Center for Biological Diversity, and many other allies are warning about, I want to acknowledge at least some that seem consistent with The Poison-Free Wildlife Act. One would limit AR applications to three distinct 35 day periods for those uses which are considered exempt from the ban but are still more restricted than uses for things like public health emergencies. The

other proposals which sound reasonable fall under what CDPR is calling "Holistic Rodent Management." The goals include developing training programs in Integrated Pest Management which encourage control methods such as habit modification, sanitation, exclusion, trapping, and nature-based solutions, before resorting to rodenticides; and, development of a "Sustainable Rodent Management Plan." To me, those sound like proposals designed to protect non-target wildlife (though I would reject their proposed one-year grace period before the training requirements take effect).

Why then, does the same presentation propose other mitigations which would do just the opposite? We must strongly oppose the following suggested changes: 1. Removal of all permitting requirements for users 2. Exempting grocery stores 3. Exempting restaurants. I estimate these proposals would add well over 100,000 new locations to those which can use AR baits, with a much lower barrier to entry for pesticide professionals. This is a clear violation of California law's language instructing CDPR to reduce threats to non-target wildlife before loosening AR restrictions.

Here is the link where you can make your comments:

[Anticoagulant Rodenticide Mitigation Informal Public Comment / Taller público informal del DPR sobre la mitigación.](#)

If you'd like to fly further into the details, you can find CDPR's workshop materials [here](#).