

Christopher Lish

Thursday, November 6, 2025

California Department of Pesticide Regulation
1001 I Street (P.O. Box 4015)
Sacramento, CA 95814

Subject: Ban anticoagulant rodenticides before they hurt more wildlife -- Anticoagulant Rodenticide Mitigation Informal Public Comment

To California Department of Pesticide Regulation Director Karen Morrison,

I'm deeply concerned that the California Department of Pesticide Regulation's recent draft regulations will allow for expanded use of anticoagulant rodenticides in heavily trafficked areas like restaurants and grocery stores—where they're currently prohibited. The department's proposal to allow use of these rodenticides for more than 100 days per year also threatens wildlife and undermines important legal protections.

"It is horrifying that we have to fight our own government to save the environment."
-- Ansel Adams

For these reasons and more, I urge the department to change course and ban outright the use of anticoagulant rodenticides in California.

Even with current restrictions on rodenticides, numerous unnecessary poisonings of non-target animals occur each year, harming and killing beloved California wildlife—including mountain lions, bobcats, spotted owls, and San Joaquin kit foxes.

Viable, cost-effective alternatives to anticoagulant rodenticides already exist and would successfully address the threats posed by rodent infestations. Working to prevent infestations by implementing integrated pest-management strategies, like sealing buildings and eliminating the food and water sources that draw rodents in, is a crucial first step. Then control strategies—like contraceptives, snap traps, electric traps, and other types of nontoxic methods—could be used to address ongoing infestations.

For worst-case scenarios, more than 100 less toxic, non-anticoagulant rodenticides would still be available to protect people and the environment from rodent infestations. And in serious public health or environmental emergencies, when rodent infestations can't be addressed in any other way, the department could allow **very limited** emergency exemptions for anticoagulant rodenticide use.

The science is overwhelming: Anticoagulant rodenticides hurt wildlife and put people and pets at risk of accidental poisoning. Because of the overwhelming harm anticoagulant rodenticides cause—and because safer, cost-effective alternatives already exist—I urge the department to outright ban the use of anticoagulant rodenticides in California.

"A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."

-- Aldo Leopold

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
San Rafael, CA