

Jonathan Evans

Dear Director Morrison,

On behalf of the 22 undersigned groups and our hundreds of thousands of members and supporters in California, we are writing to urge the California Department of Pesticide Regulation to enact regulations to suspend and cancel Anticoagulant Rodenticides to protect wildlife, children, and pets from unintentional rodenticide poisoning.

Culminating with the Poison Free Wildlife Act (AB2552) California has signed into law the strongest restrictions on Anticoagulant Rodenticides in the United States. However, stronger prohibitions are needed. The California Department of Fish and Wildlife found that 72% of non-target wildlife tested in 2023 had been exposed to Anticoagulant Rodenticide, with high rates of exposure for Second Generation Anticoagulant Rodenticides even after restrictions on those rodenticides went into effect in 2021. The California Department of Pesticide Regulation has documented anticoagulant rodenticide poisonings in at least 38 different non-target species in California such as eagles, hawks, falcons, owls, bobcats, mountain lions, and even the imperiled San Joaquin kit fox, northern spotted owl, and California condor. Greater restrictions are needed.

Anticoagulant rodenticides pose an unreasonable risk to children and pets. The most recent data from the National Poison Data System documented over 2,800 anticoagulant rodenticide poisonings in 2023 with over 75% of those rodenticide poisonings occurring in children. Additionally, evidence continues to mount regarding increased mortality because of exposure. A recent study found that there was "reduced survival among children with [leukemia] previously exposed to rodenticides." Rodenticides can also increase disease prevalence in rodents by weakening their immune systems and disrupting social structures. Additionally, more than 100 pets needlessly die each year due to rodenticide exposure. More protections for California families are necessary.

There are a wide range of cost-effective alternatives available today. Sealing buildings and eliminating food and water sources are a necessary first step. Rodent fertility control reduces rodent populations without harming non-target species. Lethal rodent control strategies that involve snap traps, electric traps, and other non-toxic methods can then be implemented to address any infestations. Several types of less toxic rodenticides are available as well. Without holistic rodent management, rodenticides are an inadequate, short term, and counterproductive solution. Resources for sustainable alternatives are readily available via online resources such as SafeRodentControl.org or RaptorsAreTheSolution.org/Got-Rats.

In the unlikely case where all other alternatives to anticoagulant rodenticides have proven infeasible DPR has the ability to authorize emergency exemptions for true public health or environmental emergencies under Section 18 of the Federal Insecticide, Fungicide, and Rodenticide Act.

We respectfully urge DPR to immediately suspend and begin cancellation proceedings for the Anticoagulant Rodenticides to protect children, pets, and wildlife.

Sincerely,

Jonathan Evans

Environmental Health Legal Director
Center for Biological Diversity

Lisa Owens Viani
Director
Raptors Are The Solution

Jennifer Hauge
Senior Legislative Affairs Manager
Animal Legal Defense Fund

John Howell
Chief Executive Officer
Arroyos & Foothills Conservancy

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Dan Silver
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Endangered Habitats League

Gerry Hans
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Humane World for Animals

Spencer Lennard
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Cyrena Nouzille
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Drew Feldmann
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Penelope Maldonado
Executive Director
The Cougar Fund

Ann Van Leer
Executive Director
The Escondido Creek Conservancy

William C. Leikam
President
Urban Wildlife Research Project

Melissa Baffa
Executive Director
Ventura Land Trust

Christopher Smith
Wildlife and Wild Places Program Director
WildEarth Guardians

Submitted online at: <https://cdpr.commentinput.com/?id=JsSRaG6NA>

Karen Morrison, Director
California Department of Pesticide Regulation

RE: Anticoagulant Rodenticide Mitigation Informal Public Comment

Dear Director Morrison,

On behalf of the 22 undersigned groups and our hundreds of thousands of members and supporters in California, we are writing to urge the California Department of Pesticide Regulation to enact regulations to suspend and cancel Anticoagulant Rodenticidesⁱ to protect wildlife, children, and pets from unintentional rodenticide poisoning.

Culminating with the Poison Free Wildlife Act (AB2552) California has signed into law the strongest restrictions on Anticoagulant Rodenticides in the United States. However, stronger prohibitions are needed. The California Department of Fish and Wildlife found that 72% of non-target wildlife tested in 2023 had been exposed to Anticoagulant Rodenticide, with high rates of exposure for Second Generation Anticoagulant Rodenticides even after restrictions on those rodenticides went into effect in 2021.ⁱⁱ The California Department of Pesticide Regulation has documented anticoagulant rodenticide poisonings in at least 38 different non-target species in California such as eagles, hawks, falcons, owls, bobcats, mountain lions, and even the imperiled San Joaquin kit fox, northern spotted owl, and California condor.ⁱⁱⁱ Greater restrictions are needed.

Anticoagulant rodenticides pose an unreasonable risk to children and pets. The most recent data from the National Poison Data System documented over 2,800 anticoagulant rodenticide poisonings in 2023 with over 75% of those rodenticide poisonings occurring in children.^{iv} Additionally, evidence continues to mount regarding increased mortality because of exposure. A recent study found that there was “reduced survival among children with [leukemia] previously exposed to rodenticides.”^v Rodenticides can also increase disease prevalence in rodents by weakening their immune systems and disrupting social structures.^{vi} Additionally, more than 100 pets needlessly die each year due to rodenticide exposure.^{vii} More protections for California families are necessary.

There are a wide range of cost-effective alternatives available today. Sealing buildings and eliminating food and water sources are a necessary first step. Rodent fertility control reduces rodent populations without harming non-target species. Lethal rodent control strategies that involve snap traps, electric traps, and other non-toxic methods can then be implemented to address any infestations. Several types of less toxic rodenticides are available as well. Without holistic rodent management, rodenticides are an inadequate, short term, and counterproductive solution. Resources for sustainable alternatives are readily available via online resources such as [SafeRodentControl.org](https://www.saferodentcontrol.org) or [RaptorsAreTheSolution.org/Got-Rats](https://www.raptorsarethesolution.org/got-rats).

In the unlikely case where all other alternatives to anticoagulant rodenticides have proven infeasible DPR has the ability to authorize emergency exemptions for true public health or

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ⁱ Anticoagulant Rodenticides include Second Generation Anticoagulant Rodenticides (Brodifacoum, Bromadiolone, Difenacoum, Difethialone) and First Generation Anticoagulant Rodenticides (Chlorophacinone, Diphacinone, Warfarin).

ⁱⁱ Bourbour, R.P., et al., 2023 Summary of Pesticide Exposures & Mortalities in Non-target Wildlife. Report prepared by the California Department of Fish and Wildlife, Wildlife Health Laboratory, Rancho Cordova, CA. (2024), [biologicaldiversity.org/programs/environmental_health/pdfs/2023-CDFW-WHL-Annual-Pesticide-Exposure-Report.pdf](https://www.biologicaldiversity.org/programs/environmental_health/pdfs/2023-CDFW-WHL-Annual-Pesticide-Exposure-Report.pdf)

ⁱⁱⁱ California Department of Pesticide Regulation, *Memorandum: Second Generation Anticoagulant Rodenticides* (CDPR 2013 Memorandum) from Deborah Daniels, DVM, Senior Environmental Scientist (June 27, 2013), Tables 3 and 4 at 10-11, https://www.biologicaldiversity.org/campaigns/pesticides_reduction/pdfs/DPR-2013-SGAR-Memo.pdf

^{iv} Gummin, D. et al., 2023 Annual Report of the National Poison Data System® (NPDS) from America's Poison Centers: 41st Annual Report, Clinical Toxicology, DOI: 10.1080/15563650.2024.2412423 (2024): <https://piper.filecamp.com/uniq/dPhQdu6eCQnIQ5R.pdf> at 177

^v Desai, S, et al., Pre-and Postnatal Exposures to Residential Pesticides and Survival of Childhood Acute Lymphoblastic Leukemia. *Cancers* 17.6 (2025): 978, <https://doi.org/10.3390/cancers17060978>.

^{vi} Murray MH, et al., Urban rat exposure to anticoagulant rodenticides and zoonotic infection risk, *Biol. Lett.* 1720210311 (2021), <https://doi.org/10.1098/rsbl.2021.0311>; Lee MJ, et al., Effects of Culling on *Leptospira interrogans* Carriage by Rats. *Emerg Infect Dis.* 2018 Feb;24(2):356-360. doi: 10.3201/eid2402.171371; Mariën J, et al., Rodent control strategies and Lassa virus: some unexpected effects in Guinea, West Africa. *Emerg Microbes Infect.* 2024 Dec;13(1):2341141. doi: 10.1080/22221751.2024.2341141.

^{vii} U.S. Environmental Protection Agency, *Rodenticides; Notice of Intent To Cancel Registrations of, and Notice of Denial of Applications for, Certain Rodenticide Bait Products*, 78 Fed. Reg. 8123, 8125 (February 5, 2013), <https://www.govinfo.gov/content/pkg/FR-2013-02-05/pdf/2013-02500.pdf>