



California Department of Pesticide Regulation

1001 I Street (P.O. Box 4015)  
Sacramento, CA 95814

Re: Anticoagulant Rodenticide Mitigation Informal Public Comment

Dear DPR Staff:

On behalf of the California Farm Bureau Federation (Farm Bureau) and our more than 26,000 member families across California, we appreciate the opportunity to provide comments on the Department of Pesticide Regulation's (DPR) draft proposal to mitigate first- and second-generation anticoagulant rodenticides (FGARs and SGARs). We recognize DPR's statutory responsibility under Food and Agricultural Code section 12978.7 to minimize impacts to wildlife while maintaining essential pest management tools.

Farm Bureau supports a balanced, science-based regulatory framework that safeguards environmental health and ensures continued availability of rodenticides critical for protecting crops, livestock, and on-farm infrastructure. Our members rely on these tools to control rodents that threaten stored feed, irrigation systems, and food processing facilities statewide. We respectfully offer the following comments and recommendations on specific aspects of DPR's proposal where stakeholder input was requested.

**Definition of “Man-Made Structures” and Allowed Sites**

DPR proposes limiting anticoagulant use to a narrow list of man-made structures within 50 feet of facilities such as food processing sites, grocery stores, and storage areas. While we understand DPR's intent to align with existing statutory exemptions, these definitions do not adequately reflect the diversity of California agricultural operation areas.

Many on-farm rodent pressures occur away from enclosed structures—including along irrigation lines, feed storage yards, composting areas, and field perimeters. Rodent activity along canals, levees, and agricultural roads poses significant risks to water delivery systems, flood-control infrastructure, and worker safety. These areas are integral to agricultural production and must remain eligible for anticoagulant use.

In addition, Farm Bureau urges DPR to recognize that airports, rural residential areas adjacent to agricultural land, and other mixed-use edge zones are experiencing severe rodent infestations that threaten both property and public health. Structural pest control professionals have reported increasing difficulty managing these populations under existing restrictions. Allowing limited, managed use of FGARs and SGARs in these settings—consistent with label directions and professional oversight—would provide critical flexibility to prevent infestations from spreading between urban and agricultural environments.



We therefore recommend DPR clarify that “agricultural production site” includes associated outbuildings, pump stations, irrigation canals, levees, and access roads, airports, and rural residential areas bordering farmland. We also recommend that growers are able to maintain flexibility for FGAR use consistent with product labels where structural proximity is not practical or effective.

Rodents are not only destructive to crops and infrastructure but also significant carriers of disease. California has experienced an uptick in rodent-borne illnesses—including cases of leptospirosis, typhus, and even plague—which public health officials have linked to unsanitary rodent infestations in both urban and rural areas. Preventing rodent populations from spreading through canals, levees, and agricultural access roads is critical not only to maintaining farm productivity but also to protecting the health of farmworkers, rural communities, and downstream water users. Without such clarification, producers may lose access to essential rodent control measures, increasing crop contamination, infrastructure damage, and water-system failure risk.

#### **Duration of Baiting Limits**

The proposed 35-day per application and 105-day annual limit may be appropriate in structural or laboratory settings but does not reflect the variability of seasonal rodent pressures in agriculture. Rodent activity fluctuates with rainfall, harvest timing, and habitat changes—factors that can extend infestation periods well beyond 35 days.

Farm Bureau recommends DPR allow County Agricultural Commissioners to grant duration extensions based on documented agricultural need or verified ongoing infestation and clarify whether overlapping infestations at separate “sites” within one property would count separately toward the 105-day total. These refinements would ensure that pest control decisions remain practical and responsive to real-world conditions.

#### **Sustainable Rodent Management Training and Plan**

Farm Bureau supports continued education on Integrated Pest Management (IPM) principles and recognizes the Department’s effort to enhance awareness of sustainable rodent management practices. However, as currently written, the proposed requirements would create increased training obligations for licensed applicators and private operators who already meet extensive continuing education (CE) standards through DPR and the Structural Pest Control Board.

We also recommend that DPR partner with the University of California Cooperative Extension (UCCE) to develop, certify, and deliver the required Sustainable Rodent Management training program. UCCE already provides well-established IPM training, technical guidance, and outreach across the state’s agricultural and structural pest sectors. Leveraging this existing expertise would ensure scientific rigor, statewide accessibility, and credibility among both agricultural and urban users.



In addition, Farm Bureau recommends that DPR:

- Approve third-party training providers, including UC IPM, commodity groups, and trade associations, to deliver courses meeting DPR's content standards;
- Allow completion of these courses to count toward existing DPR and SPCB CE requirements, avoiding redundant certification systems; and clarify that the required Sustainable Rodent Management Plan may be general (not site-specific) and rely on existing Pesticide Use Reporting (PUR) systems for recordkeeping compliance. This approach would reduce administrative burden, and promote consistent adoption of IPM practices statewide.

#### **Implementation Timeline**

DPR proposes a 12-month delay between the regulation's effective date and the start of training and plan requirements. Farm Bureau recommends extending this period to 18–24 months to allow time for course development, outreach to applicators, and adaptation of recordkeeping systems. A longer phase-in would improve compliance and avoid disruption to ongoing rodent management programs.

California agriculture remains committed to protecting wildlife and the environment while maintaining effective tools for managing destructive rodent populations. Farm Bureau appreciates DPR's collaborative approach and looks forward to continued dialogue as this rulemaking proceeds.

Sincerely,  
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