

Anthony (Tony) DeSena

Subject: Public Comment on DPR's Anticoagulant Rodenticide Mitigation Proposal

Dear Department of Pesticide Regulation,

Thank you for the opportunity to comment on the proposed mitigation measures for anticoagulant rodenticides. I appreciate DPR's efforts to reduce the devastating impacts of these poisons on wildlife, companion animals, and ecosystems across California.

Anticoagulant rodenticides are a well-documented source of secondary poisoning that affects not only target rodents but also owls, hawks, bobcats, coyotes, foxes, and even domestic pets. These chemicals persist in the environment and accumulate through the food web, undermining natural rodent control and inflicting widespread, slow, and painful deaths. The need for meaningful mitigation could not be clearer.

Rulemaking Text & Intent

Overall, the proposed rulemaking text captures the intent presented in the September 24th workshop. However, DPR should ensure that mitigation measures are both enforceable and unambiguous. Specifically, the rule should make clear that prevention and exclusion—rather than poison—are the preferred and expected methods for rodent control whenever feasible.

Exempted Sites

I urge DPR to keep exemptions extremely limited. Any exemptions should include robust justification, oversight, and reporting requirements to prevent misuse. Urban parks, schools, and residential areas should not be exempt under any circumstances.

Training & Implementation

Training is an essential part of the mitigation plan. DPR should develop and provide standardized, science-based training to ensure consistency and accuracy, rather than leaving this task to third parties. The training should emphasize humane, nonlethal alternatives, ecological consequences of poison use, and best practices in rodent-proofing and waste management.

Counting the training toward continuing education (CE) credits would help ensure broad participation and compliance.

Recordkeeping & Delay Period

The proposed requirement for centralized recordkeeping is sound, but DPR should also make these records publicly accessible to promote transparency. A 12-month buffer before the training requirement takes effect seems reasonable, provided that clear communication and outreach begin immediately.

California's native wildlife and companion animals continue to suffer needless harm from these toxic chemicals. Strong, science-driven regulation is urgently needed to phase out their use and

promote sustainable, humane pest management practices.

Thank you for your leadership on this critical issue and for seeking public input in the development of these protections.

Sincerely,

Anthony DeSena
Rancho Mirage, CA