

Tyler Johnson

I read the 2025 DPR draft on the restriction of anticoagulant rodenticides (ARs) in California. I also attended the workshop (ZOOM) and was a verbal participant. Overall, you guys are decreasing restrictions from current law. Current law has AB1788, AB1322, and AB2552 in authority. I am not upset that you guys are allowing the use of additional ARs, first generation. What I am disappointed in, is the amount of exceptions to the law you guys are allowing for ARs usage. Current law prohibits use of ARs in/around grocery stores, restaurants, airports, non-production agriculture sites, and wildlife habitat areas. You guys are fully removing "restaurants and grocery stores" from prohibited use and are allowing exceptions for airports, non-production agriculture sites, and even wildlife habitat areas. This new allowing of ARs in places in which they are currently prohibited (9/24/2025 I am writing this), won't change anything. Matter of fact, there will be an increase of secondary wildlife poisoning, which in turn will cause the rodent populations to become worse. Can't you see? Beautiful Great Horned Owls, the majestic Mountain Lions, Black bears, will be exposed to even higher levels of ARs. ARs cause tremendous suffering for these animals, even if they don't outright bleed to death from the inside out, their immune system will be compromised.

MY SOLUTION: Maintaining the current usage restrictions under law or make the uses even stricter. Whatever you do, don't lift any of the current restrictions. In other words, amend your current draft because you are allowing way too many uses for ARs, which is equivalent to having no uses at all.

I see you have spent a significant amount of time discussing training, continuing education, and record keeping. Let's be real, employees don't care about these trainings. Employees turn on these trainings, do something else, then when it's finished they get a certificate and move on with the rest of their day. The point I am trying to make is you are spending too much time on such a little thing. You should keep all of this talk to one sentence in your draft and spend more time maintaining the current AR restricted uses under law or go even stricter.

Overall, the power is in your hands- don't take any bribes, look at the facts, we are supposed to steward creation well. Choose wisely.