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RE: Anticoagulant Rodenticide Mitigation Informal Public Comment

Anticoagulant rodenticides (ARs) are indiscriminate, bioaccumulative poisons. They don't just kill rats: they also poison owls, hawks, bobcats, foxes, coyotes, domestic pets, and other animals that naturally control rodent populations. In California, those poisons have been documented in coyotes, foxes, owls, hawks, and other raptors and carnivores, causing internal bleeding and long-term illness or death. ARs are a cause of suffering that no animal deserves, not even the rats.

After extensive study and deliberation, California passed three critical laws between 2020 and 2023 to protect wildlife from ARs:

- > AB 1788 delivered the first statewide restrictions on second-generation ARs.
- > AB 2552 (Poison-Free Wildlife Act) strengthened protections and mandated safer practices.
- > AB 1322 closed loopholes and updated labeling and enforcement.

The California Department of Pesticide Regulation (CDPR) proposal weakens those laws by reopening pathways for routine, widespread poison use, without emergency justification.

Instead of strengthening wildlife protections, CDPR recommends a major rollback. The CDPR proposal would allow ARs to be used for more than 100 days each year, allowing continued contamination of predators, pets, and ecosystems. That goes against California's commitment to protect wildlife, pets, and even children from those dangerous poisons.

I oppose removing all permitting requirements for users as well as exempting grocery stores and restaurants. Those proposals could add more than 100,000 new locations to those that can use AR baits, with a much lower barrier to entry for pesticide professionals.

California law requires the CDPR to show a meaningful reduction in the levels of ARs persisting in the bodies of non-target wildlife before the department can lift any of the law's use restrictions. One of the more recent studies is a paper published in "The Journal of Wildlife Management" in October 2024, which found that 98.1% of urban (including suburban) coyotes in Southern California were exposed to at least one AR (<https://wildlife.onlinelibrary.wiley.com/doi/10.1002/jwmg.22696>). The CDPR has shared no new studies, yet their proposal would allow a drastic increase in usage. That is a clear violation of the California law's language instructing CDPR to reduce threats to non-target wildlife before loosening AR restrictions.

In summary:

- > Rollbacks of AB 1788, AB 2552, and/or AB 1322 are not acceptable.
- > No ARs should be allowed, except during a declared public health or environmental emergency (per current law).
- > California must invest in ecological rodent control--not more poisons--to protect raptors and other predators.

Californians have already demanded poison-free alternatives to anticoagulant rodenticides. CDPR must honor the law and its obligation to protect wildlife.

Thank you for the opportunity to comment and for your consideration.