September 3, 2013

Linda Irokawa-Otani, Regulations Coordinator
Department of Pesticide Regulation
1001 I Street, P.O. Box 4015
Sacramento, California 95812-4015

RE: Designating Brodifacoum, Bromadiolone, Difenacoum, and Difethialone as Restricted Materials (Second Generation Anticoagulant Rodenticide Products)- DPR Regulation NO. 13-002 Letter

Dear Ms. Irokawa-Otani

Enclosed please find the following letter signed by:

Senator Darrell Steinberg
Senator Fran Pavley
Senator Hannah-Beth Jackson
Senator Jerry Hill
Senator Mark Leno
Senator Ted Lieu
Assemblyman Anthony Rendon
Assemblyman Richard Bloom
Assemblyman Tom Ammiano
Assemblyman Kevin Mullin
Assemblyman Jeff Gorell
Assemblyman Das Williams
Assemblyman Mark Stone
Assemblyman Paul Fong

Thank you for your consideration on this matter.

Sincerely,

[Signature]

Senator Fran Pavley
September 3, 2013

Linda Irokawa-Otani, Regulations Coordinator  
Department of Pesticide Regulation  
1001 I Street, P.O. Box 4015  
Sacramento, California 95812-4015

Via fax to 916-324-1452  
Via email to dpr13002@cdpr.ca.gov

RE: Designating Brodifacoum, Bromadiolone, Difenacoum, and Difethialone as Restricted Materials (Second Generation Anticoagulant Rodenticide Products) - DPR Regulation No. 13-002

Dear Ms. Irokawa-Otani,

We, the undersigned members of the California State Legislature, are writing to express our strong support of proposed DPR Regulation No. 13-002, which would classify second generation anticoagulant rodenticides as restricted products. We believe these regulations are a necessary and important step to protect public health, and to reduce the exposure of nontarget wildlife and domestic pets to these toxic materials.

Second generation anticoagulant rodenticides are toxic several times over. They are toxic enough to be lethal after a single feeding, but because it takes several days for a rodent to die after feeding on the toxic bait, they often return to the bait site several times before dying. This leads to a super-lethal dose residing in the carcass. When a nontarget wild animal – raptors, wild mammals, even pet dogs – eat the rodent, they can be adversely affected, and even killed, by the rodenticide consumed by the rodent. DPR has documented significant harm to people, pets and wildlife caused by exposure to these products, including many poisoning cases documented by UC Davis Veterinary Medical Teaching Hospital and the Department of Fish and Wildlife.

These risks are a statewide problem and must be curbed through restricting the use of these products. Current federal regulations do not go far enough to prevent use by residential customers and other uncertified users.
Restricting the use of these toxic materials to certified applicators, as the regulation proposes, will significantly reduce unintended exposures and poisonings. By classifying these rodenticides as restricted materials, the regulation will allow them to be possessed or used by, or under the direct supervision of, a certified private applicator or a certified commercial applicator. This approach will still allow for controlled use for appropriate agricultural applications, and by water agencies for purposes such as rodent control on levees, but prohibit their use in uncontrolled situations such as by residential homeowners or illegal marijuana growers. The regulations also restrict the placement of above ground baits containing these rodenticides to no more than fifty feet from man-made structures which will also reduce the exposure to nontarget wildlife.

As the only state agency that regulates pesticides, DPR is appropriate in asserting its authority with respect to regulating these chemicals and their use. We urge you to adopt the regulation.

Sincerely,