August 26, 2013

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

Dear Ms. Irokawa-Otani:

Economic Empowerment Coalition is a non-partisan public interest advocacy organization, and we work to establish an innovative synergistic platform that promotes economic empowerment; increases civic involvement; and decreases the regulatory burdens on California residents and businesses. We understand that the California Department of Pesticide Regulation recently proposed regulation which would remove the ability of California consumers to use second generation anticoagulant rodenticides. We oppose this effort, as it is destructive to already struggling communities throughout the state of California.

The presence of rodents in and around a residential or commercial structure has multiple negative effects. It is no secret that these rodents carry a plethora of diseases that spread filth and cause illnesses. Overpopulation of rodents can and will result in a decline in health standards in California. Rodents target older neighborhoods with aging structures. Second-generation anticoagulants consistently make a profound difference in clearing the area of rodents and reverting to some semblance of cleanliness.

Taking second generation anticoagulants away from California consumers who are trying to protect their homes will hurt low-income families more than anyone else and will lower the standard of living in those neighborhoods that are already disadvantaged. If second-generation anticoagulants are banned from consumers use, these families will not be able to afford to effectively deal with the problem at hand. This will cause health problems to rise and a previously disadvantaged community to be dragged even deeper into problems.

There is no substantive proof of negative effects on wildlife from household consumer uses of these products. It is our understanding that proponents of this regulation claim that second-generation anticoagulants hurt wildlife populations, even when applied by consumers in their homes. However, there simply is no significant evidence to show this is occurring from household use, particularly when these same anticoagulants are being used outdoors by professional applicators and for agricultural purposes.

On behalf of all the California citizens we represent, we urge you to reconsider the proposed rulemaking as it relates to consumer access to second-generation rodenticides.

Sincerely,

Andree Driskell-Grady
Founding Member