September 27, 2013

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

Comments Regarding Proposed Regulatory Action on Second Generation Anticoagulant Rodenticides

Friends of Ballona Wetlands (“FBW”) is a non-profit organization that has been dedicated to protecting and restoring the Ballona Wetlands for the past 30 years. Located at the base of a highly urbanized watershed, the Ballona Wetlands is one of the largest coastal wetlands in Los Angeles County. Except for a small flood control channel known as Ballona Creek, the wetlands are surrounded by urban development. Plans for wetland restoration are underway at the State level.

We have observed rodent bait stations outdoors in many areas adjacent to the wetlands, including levees of the flood control channel, restaurants, and office buildings within view of the ocean and the local marina. The potential for poisoning of secondary, non-target wildlife is high. As DPR stated in its rationale for the proposed regulation, research has shown that secondary poisoning is a widespread problem in California. Wildlife species that live within or visit the Ballona Wetlands are clearly at risk from these pesticides.

While the proposed regulation may help reduce the number of secondary poisoning incidents by taking the pesticides out of the hands of the general public, and limiting their use to within 50 feet of man-made structures, the problem will remain significant.
Licensed applicators cannot control human or wildlife behavior. Animals will not recognize the 50-foot limit, and what is to prevent someone from building a shed 50 feet from their house or barn, for the sole purpose of extending the regulatory limit on placement of the poisoned bait? Even a restriction such as indoor-use only will not prevent a poisoned rodent from leaving the building and falling prey to a domestic pet or wild predator.

We believe the proposed regulation will not achieve its intended purpose. Realistically, unless DPR plans to significantly expand its enforcement staff and budget, the only way that a licensed or certified applicator could be caught violating the regulation is if a non-target animal becomes sick or dies and someone finds it. This potential outcome is unacceptable.

As DPR has pointed out, there are rodenticide alternatives to anti-coagulants that have significantly reduced risks of secondary poisoning. We urge DPR to reconsider the proposed regulation and consider a complete ban on all anti-coagulant rodenticides.

We appreciate this opportunity to comment and look forward to DPR’s continued vigilance on this important issue.

Sincerely,

[Signature]

Edith Read, PhD
Board Member and Science/Restoration Committee Chair, Friends of Ballona Wetlands