July 23, 2013

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

Re: CDPR Banning of second-generation anticoagulant rodenticides is unnecessary and harmful

Dear Ms. Irokawa-Otani:

The Western Manufactured Housing Communities Association (WMA) is a statewide trade association whose members are largely mobilehome park owners who, collectively own, operate and control over 175,000 mobilehome spaces in California. WMA has over 1600 member parks located in all 58 counties of California. Community owners, operators, and developers of manufactured home communities in California, as well as suppliers of industry goods and services maintain membership in WMA.

We are opposed your recent proposed rulemaking which restricts consumer use of second-generation anticoagulant rodenticides. We believe this effort to be ill-informed, misplaced, and will only further the presence of rats and mice in residential and commercial properties throughout the state. This proliferation of rats and mice will lead to destruction of property and the spread of disease.

Second-generation anticoagulant rodenticides are a cost effective tool for both residents and operators to reduce rodent populations, and when used properly there is little threat to wildlife in their native habitats, pets or children.

Should this rulemaking be issued in final form without changes, it would cost a significant amount for a homeowner to obtain professional help comparable to use of these rodenticides. We find this to be an undue financial burden on those we represent. In addition, we are concerned that residents might switch to more deadly forms of poisons without antidotes — risking the lives of innocent children and pets. Today, if the second-generation anticoagulant rodenticides are accidently consumed, treatment is readily available from a doctor or hospital.

For these reasons, we speak on behalf of owners and operators we represent in urging you not to place a ban on consumer use of second-generation anticoagulant rodenticides. We kindly ask that you exempt consumer uses from your rulemaking proposal.
Rodent overpopulation is a real problem that needs to be addressed in an effective yet affordable manner. Instituting this restriction on consumers would not solve any health risk issues; in fact, it would make these issues worse for all the reasons just mentioned.

We urge you to consider the best interest of all those that would be affected and decide whether this is really the answer to the problem at hand. The Western Manufactured Housing Communities Association supports exempting residential consumer uses from the proposed restrictions on second-generation anticoagulants.

Sincerely,

Sheila Dey
Executive Director and General Counsel, WMA