August 14, 2013

Linda Irokawa-Otani, Regulations Coordinator
Department of Pesticide Regulation
1001 I Street, Post Office Box 4015
Sacramento, California 95812-4015

Notice of Proposed Regulatory Action
Designating Brodifacoum, Bromadiolone, Difenacoum, and
Difethialone as Restricted Materials (Second Generation
Anticoagulant Rodenticide Products) DPR Regulation No. 13-002

Dear Ms. Irokawa-Otani:

The Wildlife Corridor Conservation Authority (WCCA) was created to provide for the proper planning, conservation, environmental protection, and maintenance of the habitat and wildlife corridor between Whittier-Puente Hills, Chino Hills, and the Cleveland National Forest in the Santa Ana Mountains. WCCA is concerned with the negative effects of second generation anticoagulant rodenticides (SGARs) on local native wildlife, for example, through secondary exposure, including its link to mange, a potentially harmful skin disease.

WCCA supports the regulation proposed by the Department of Pesticide Regulation. According to the Notice, the proposed regulation would restrict SGARs to only certified applicators, which will significantly reduce unintended exposures to nontarget wildlife. The regulation would also prohibit the placement of aboveground baits containing these ingredients more than 50 feet from a man-made structure unless there is a feature associated with the site that is harboring or attracting the pests targeted on the label.

Although the Notice states that adoption of these regulations will provide a benefit to the environment by adding an extra level of environmental protection and reducing unintended exposures to nontarget wildlife, WCCA recommends that the regulation take a step further to ban the use of SGARs. The ban will effectively ensure that nontarget wildlife will no longer be exposed to SGARs rather than simply reducing unintended exposures to SGARs. A ban on SGARs will also greatly reduce the amount of toxins in the anticoagulants that are currently present in the environment and wildlife over time.
We appreciate your consideration of these comments. If you have any questions, please contact Judi Tamasi of our staff by phone at (310) 589-3230, ext. 121, or by email at judi.tamasi@mrca.ca.gov.

Sincerely,

[Signature]

Glenn Parker
Chairperson