

**SANTA MONICA MOUNTAINS CONSERVANCY**

LOS ANGELES RIVER CENTER & GARDENS  
570 WEST AVENUE TWENTY-SIX, SUITE 100  
LOS ANGELES, CALIFORNIA 90065  
PHONE (323) 221-8900  
FAX (323) 221-9001  
WWW.SMMC.CA.GOV

**REVISED**

August 26, 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 Santa Monica Mountains Conservancy (Conservancy) offers the following comments and recommendations on the above referenced Notice of Proposed Regulatory Action from the Department of Pesticide Regulation. Although the Conservancy supports the designation of brodifacoum, bromadiolone, difenacoum, and difethialone as California-restricted materials, making all second generation anticoagulant rodenticides (SGAR) products restricted materials, the Conservancy recommends that the Department of Pesticide Regulation take a further step to ban the use of SGARS.

The negative effects of SGARS on native wildlife include secondary exposure that could lead to death, and its link to mange, a potentially fatal skin disease. Targeted and non-targeted individuals may be affected by direct ingestion of the anticoagulants or by ingesting an animal that has ingested the toxin, causing secondary exposure. The toxin may accumulate in higher concentrations as species higher on the food chain ingest the affected individuals.

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 these regulations will add an extra level of environmental protection and significantly reduce unintended exposures to non-target wildlife, the Conservancy urges that

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the regulation completely ban the use of SGARs. Such a ban will more effectively ensure that non-target wildlife will no longer be exposed to SGARs rather than simply reducing unintended exposures to SGARs. The ban will also allow the negative effects of SGARs to be greatly reduced as the toxins in the anticoagulants currently being used are phased out of the environment and wildlife over time.

We appreciate your consideration of these comments. If you have any questions, please contact Paul Edelman, Deputy Director for Natural Resources and Planning, by phone at (310) 589-3200, ext. 128, or by email at [edelman@smmc.ca.gov](mailto:edelman@smmc.ca.gov).

Sincerely,

IRMA MUÑOZ  
Chairperson