



AB 2596 (Bloom) Rodenticides: SUPPORT

Honorable Luis Alejo
Chair, Assembly Committee on Environmental Safety and Toxic Materials
Fax: (916) 319-3950

April 5, 2016

RE: AB 2596 (Bloom) Rodenticides: SUPPORT

Dear Honorable Assemblymember Luis Alejo,

The 57 undersigned organizations and city of Malibu urge you to support AB 2596, which seeks to take stronger measures to protect children, pets, and wildlife from unintentional rodenticide poisoning. The use of rat, mouse, and rodent poisons by the general public and licensed applicators leads to the deaths of wildlife and pets and the hospitalization and illness of people, especially children. AB 2596 allows for common sense controls on these dangerous poisons in order to eliminate their use where they lead to unnecessary poisonings to non-target organisms while still allowing for their use to protect California's agricultural economy and to protect public health and the environment.

Given the wide array of cost-effective alternatives available on the market today to address rodent infestations, there is no need for our families and the environment to continue to suffer poisonings due to rodenticides. AB 2596 is narrowly targeted on the most dangerous rodenticide uses and specifically exempts agricultural activities, which allows for rodenticides to still be used to address rodent infestations affecting agriculture. If there are ever true public health or environmental emergencies that can only be addressed with rodenticides Californians would still have the opportunity to rely upon rodenticides under section 18 of the Federal Insecticide, Fungicide, and Rodenticide Act, which allows the use of pesticides in emergency circumstances or to prevent significant economic loss or threats to the environment.¹

Regulations enacted in 2014 by the California Department of Pesticide Regulation to minimize harm from one subset of rodenticides—Second Generation Anticoagulant Rodentices—have proven ineffective because necropsy data performed by the California Department of Fish and Wildlife and other scientists has demonstrated that unnecessary poisonings continue to pose a rampant threat to wildlife and pets. The use of rodenticides by licensed pest control applicators still allows rodents to consume rodenticides and then poison upper-level predators who consume the rodents themselves, which will result in continued deaths of wildlife and pets. This unintentional poisoning decreases California's ability to control rodent infestations because it kills the natural predators that feed on rats, mice, and other rodents and decreases natural rodent control strategies.

Rodenticides pose an unreasonable risk to children. According to safety calculations from the Environmental Protection Agency (EPA), the estimated child exposure from taking just one 5-

¹ Title 40, Code of Federal Regulations, part 166; *See also* California Department of Pesticide Regulation, Section 18: Emergency exemptions, available at <http://www.cdpr.ca.gov/docs/registration/guides/section18.pdf>.

gram bite of rodenticide bait greatly exceeds possible safe levels.² Between 1999 and 2009, the American Association of Poison Control Centers received reports of an average of 17,000 human exposures to rodenticides each year, with 85% of these exposures, (i.e., approximately 15,000 per year), occurring to children less than 6 years of age.³ Between 1999 and 2003, an average of 3,617 of these cases per year were treated in a health care facility, and an average of 17 were treated in an Intensive Care Unit.⁴

Rodenticides pose an unreasonable risk to pets and domestic animals as well. Between 1999 and 2009, data indicate that rodenticides caused about 160 severe (death or major effect) domestic animal incidents each year, which EPA believes is a significant underestimate.⁵ More than 100 pets needlessly die each year due to rodenticide exposure.⁶

Rodenticides also pose an unreasonable risk to wildlife. EPA's ecological incident report documents anticoagulant rodenticide residues in 27 avian species and 17 mammalian species.⁷ Poisonings and deaths in California have been documented in numerous species such as eagles, hawks, falcons, owls, bobcats, mountain lions, and even the imperiled San Joaquin kit fox and northern spotted owl.⁸ The problem is so severe that over 70% of wildlife tested in California had been exposed to rodenticides.⁹

Fortunately a range of viable, cost-effective alternatives exist that can address the threat posed by rodent infestations. Integrated pest management strategies prevent infestations by sealing buildings and eliminating food and water sources, and are a necessary first step. Lethal rodent control strategies that involve snap traps, electric traps, and other non-toxic methods can then be implemented to address any infestations. Several types of less toxic rodenticides are available as well. More information on effective and affordable alternatives can be found at www.SafeRodentControl.org.

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² USEPA 2011, Draft Notice of Intent to Cancel and Denial (2011 Draft NOIC), at 16 (Nov. 2, 2011).

³ EPA 2011 Draft NOIC, at 18.

⁴ U.S. Environmental Protection Agency, Final Risk Mitigation Decision for Ten Rodenticides (EPA 2008 Final RMD), at 7 (May 28, 2008).

⁵ EPA 2011 Draft NOIC, at 23.

⁶ U.S. Environmental Protection Agency, *Rodenticides; Notice of Intent To Cancel Registrations of, and Notice of Denial of Applications for, Certain Rodenticide Bait Products*, 78 Fed. Reg. 8123, 8125 (February 5, 2013).

⁷ EPA 2008 Final RMD, at 8.

⁸ California Department of Pesticide Regulation, *Memorandum: Second Generation Anticoagulant Rodenticides* (CDPR 2013 Memorandum) from Deborah Daniels, DVM, Senior Environmental Scientist (June 27, 2013), Tables 3 and 4 at 10-11.

⁹ CDPR 2013 Memorandum at 1.

Given the overwhelming harm posed by rodenticides and the availability of cost-effective alternatives, the following groups urge California to better regulate these poisons to protect children, pets, and wildlife.

Sincerely,

Laura Rosenthal
Mayor
City of Malibu

Jonathan Evans
Environmental Health Legal Director
Center for Biological Diversity

Lisa Owens Viani
Director
Raptors Are The Solution

Kian and Joel Schulman
Founders
Poison Free Malibu

Courtney Fern
California State Director
Humane Society of the United States

Natalynne DeLapp
Executive Director
Environmental Protection Information Center

Alison Simard
Chair
Citizens for Los Angeles Wildlife (CLAW)

Pamela Flick
California Representative
Defenders of Wildlife

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Integral Ecology Research Center

Allen M Fish
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Golden Gate Raptor Observatory

Sarah Aird
Co-Director
Californians for Pesticide Reform

Medha Chandra
Campaign Coordinator
Pesticide Action Network North America

Lynn Cullens
Associate Director
Mountain Lion Foundation

Bill Allayaud
California Director of Government Affairs
Environmental Working Group

Judith Lamare
President
Friends of Swainson's Hawk

Alex Godbe
Director
Hungry Owl Project

Vann Masvidal
President and Advocacy Committee Chairperson
California Council for Wildlife Rehabilitators

Monica Bond
Principal Scientist
Wild Nature Institute

Nan Wishner
Board Member
California Environmental Health Initiative

Nancy Wenninger
Conservation Chair
Mt. Diablo Audubon

Stephen Wells
Executive Director
Animal Legal Defense Fund

Jennifer deNicola
President
America Unites for Kids

David Phillips
Executive Director
Earth Island Institute

Travis Longcore
Science Director
The Urban Wildlands Group

June Louks
Founder
Malibu Agricultural Society

Jo Ann Baumgartner
Executive Director
Wild Farm Alliance

Sara Wan
Executive Director
Western Alliance for Nature

Caroline Cox
Research Director
Center for Environmental Health

Eric Mills
Coordinator
Action for Animals

Caleb Dardick
Executive Director
South Yuba River Citizens League (SYRCL)

Sharon Negri
Director
WildFutures

Camilla Fox
Founder & Executive Director
Project Coyote

Jenny Papka
Director
Native Bird Connections

Rebecca Dmytryk
President and CEO
National Association for Wildlife Emergency Services

Drew Feldmann
Conservation Chair
San Bernardino Valley Audubon Society

Anna Marie Reams
Director
Wildlife Care of SoCal

Roger Pugliese
Chair
Topanga Association For A Scenic Community

Cindy Kamler
Executive Director
Eastern Sierra Wildlife Care

Ara Marderosian
Executive Director
Sequoia ForestKeeper

Kim Lamorie
President
Las Virgenes Homeowners Federation

Megan Isadore
Founder and Executive Director
River Otter Ecology Project

Deborah Pendrey
Program Director/Treasurer
Ojai Valley Green Coalition

Van Collinsworth
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Preserve Wild Santee

Patt Healy
Co Founder
Malibu Coalition for Slow Growth

Patt Healy
Founder
Malibu Monarch Project

Roui Israel
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Advocates for Malibu Public Schools

Noreen Weeden
Conservation Project Manager & Volunteer Coordinator
Golden Gate Audubon

Ron Bottorff
Chairman
Friends of the Santa Clara River

Ben Allanoff
Chair
Topanga Creek Watershed Committee

Heidi Perryman, Ph.D.
President & Founder
Worth A Dam

Ali Crumpacker
Director
Fund for Animals Wildlife Center

Michael Wellborn
Vice-President
Friends of Harbors, Beaches and Parks

Michael Wellborn
President
California Watershed Network

Josh Bradt
Director
California Urban Streams Partnership

Cindy Machado
Director of Animal Services
Marin Humane Society

Kelle Kacmarcik
Director of Wildlife Solutions & Advocacy
Wildcare

Gary Weitzman, DVM, MPH, CAWA
President and CEO
San Diego Humane Society

Richard W. Halsey
Director
The California Chaparral Institute

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Mayor

Office of the Mayor

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March 28, 2016

Honorable Luis Alejo, Chair
Environmental Safety & Toxic Materials Committee
1020 N. Street, Room 171
Sacramento, CA 95814

Dear Assembly Member Alejo,

I am writing to you to convey my support for AB 2596 (Asm. Bloom). Rat poisons are silent, indiscriminate killers that end up killing wildlife such as owls, bobcats, and foxes, which help to naturally control the rodent population. We have to stop poisoning the wildlife that serve as an all-natural solution to our rodent infestations.

- AB 2596 is a common sense solution to remove the most dangerous rat poisons from use by consumers and pest control companies in order to protect kids, pets, and wildlife.
- AB 2596 still allows for rodenticides to be used when there is a public health emergency and for agricultural purposes, but removes it from urban, suburban, and some wild areas where it is most dangerous.
- There are safe, cost-effective options readily available on the market today that don't indiscriminately kill wildlife.
- Dangerous rat poisons pose an unacceptable risk to imperiled wildlife, children, and pets. Over 50,000 dogs have been exposed to rodenticides, according to 2014 data from the National Poison Data System. Over 70% of wildlife tested have been exposed to toxic rodenticides affecting over 25 different animals.
- The American Association of Poison Control Centers has received reports of approximately 12,000 to 15,000 rodenticide exposures to children less than 6 years of age each year. Many of the worst affected children are from low-income families that are disproportionately exposed to rat poisons.

As the mayor of an urban city with children, pets, and wildlife and we are especially concerned about the impacts of these products on our community.

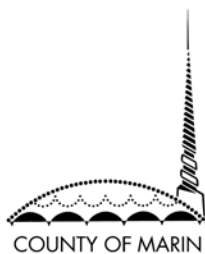
Sincerely,

A handwritten signature in blue ink, appearing to read "Tom Butt", is written over a light blue horizontal line.

Tom Butt
Mayor, City of Richmond

Home of Rosie the Riveter WWII Home Front National Historical Park

450 Civic Center Plaza, Richmond, CA 94804 | www.RichmondCAMayor.org



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Honorable Luis A. Alejo, Chair
Assembly Environmental Safety & Toxic Materials Committee
1020 N Street, Room 171
Sacramento, CA 95814

RE: AB 2596 – Prohibit Use of Pesticides with Anticoagulants - Support

Dear Assembly Member Alejo,

On behalf of the Marin County Board of Supervisors, I write to express our support for AB 2596 (Bloom), which would expand the prohibition of pesticide use containing additional specified anticoagulants.

AB 2596 is a common sense solution to remove the most dangerous rat poisons from use by consumers and pest control companies in order to protect children, pets, and wildlife. Over 70% of wildlife tested has been exposed to toxic rodenticides affecting over 25 different animals including mountain lions, bald and golden eagles, hawks, and the endangered San Joaquin kit fox. The American Association of Poison Control Centers has received reports of approximately 12,000 to 15,000 rodenticide exposures to children less than 6 years of age each year. Many of the worst affected children are from low-income families that are disproportionately exposed to rat poisons. Rat poisons are silent, indiscriminate killers that end up killing wildlife such as owls, bobcats, and foxes, which help to naturally control the rodent population.

AB 2596 still allows for rodenticides to be used when there is a public health emergency and for agricultural purposes, but removes it from urban, suburban, and some wild areas where it is most dangerous. There are safe, cost-effective options readily available on the market today that do not indiscriminately kill wildlife and endanger our children and pets.

For these reasons, we support AB 2596. Thank you for your consideration of our input.

Respectfully,

Steve Kinsey, President
Marin County Board of Supervisors

cc: The Honorable Mike McGuire, Member of the Senate
The Honorable Marc Levine, Member of the Assembly
The Honorable Richard Bloom, Member of the Assembly